



Statement of continued support by the Chief Executive Officer

To our stakeholders:

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

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations.

We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'S. Reeves'.

Seymour Reeves
Managing Director

Human Rights

1 Assessment, policy and goals

Ltd Limited has a responsibility to uphold the international human rights standards, which means not to infringe on people's rights and to address adverse human rights impacts that may be cause or contributed to. We are fully committed to respect the basic human rights of our colleagues, customers, suppliers and community, ensuring an open and collaborative relationship in all areas.

- 1.1 We have a number of policies and procedures, which aim at justice, equality, and the general principle of fairness.
- 1.2 It is our intention that our policies are open, available, consistent and fair.
- 1.3 Every attempt will be made to train staff in the principles of equality and the company procedures, which bring to bear those principles.
- 1.4 It might be expected that staff's human rights would be protected adequately by the proper operation of the company's internal Policies and Procedures, Rules and Regulations. However, at times it may be perceived that internal rules, however well applied, have not brought about a fair outcome. The Human Rights Act requires rules to be interpreted on the basis of broad principles of fairness and reason.

2 Objectives

- 2.1 We are developing a strategy for identifying Human Rights challenges. Manager's dealing with staff complaints should know how to identify a Human Rights challenge, i.e. look for key words such as "proportionality", "democratic necessity" and "violation".
- 2.2 We will investigate any allegations of human rights infringements and take any action deemed appropriate.
- 2.3 We will work closely with our supply chain, building strong relationships, to ensure our products are of the best quality and are responsibly sources.
- 2.4 All investigations, amendments to policy and legislation will be discussed in the yearly Management Review meeting.

3 Scope

3.3 We have 16 basic human rights under the law

- The Right to Life
- The Right to freedom from torture and inhuman or degrading treatment or punishment
- The Right to freedom from slavery or compulsory labour
- The Right to liberty and security
- The Right to a fair trial
- The Right not to be punished without law
- The Right to have one's family life and private life respected
- The Right to freedom of thought, conscience and religion
- The Right to freedom of expression
- The Right of assembly and association
- The Right to education
- The Right not to be subjected to the death penalty
- The Right not to be discriminated against
- The Right to marry
- The Right to protection of property
- The Right to free elections

4 Responsibilities

4.1 The Directors of Ltd have an obligation to ensure that people's human rights are not being infringed upon. Any violations are to be reported to the Business Standards Team, who must investigate and present their finding to the directors so that the appropriate action can be taken.

4.2 Claimants

4.2.1 The claimant must be a "victim" of an act (or failure to act) of a public authority but it is important to note "victim" does not simply mean an individual. It can mean a nongovernmental organisation, a group of individuals, a trades union, which has authority to represent its members' interests or even a company or minority shareholder. It is probably not possible for an educational organisation, which is itself a public body, to claim to be a victim under the Act.

4.2.2 In order to bring a claim the "victim" will need to show that it has been directly affected by the act complained of (or failure to act). This too is likely to be interpreted fairly broadly by the courts.

4.3 The Employment Law implications of the Act

4.3.1 Public authority employers will have to respect Convention rights in all their activities.

4.3.2 Certain Convention rights are likely to have greater significance than others.

4.3.3 Article 3 - the right not to suffer degrading, or inhuman treatment. This Article

could be breached in instances of serious sex and race discrimination where humiliation and mental distress is caused to the individual.

4.3.4 Article 8 - the right to respect for private and family life, home and correspondence. This is the Article most likely to apply to employment law issues because "private life" could include sexual orientation, choice of clothes and medical information. Particular issues, which may constitute a breach of the Article, include:

- CCTV surveillance
- Monitoring e-mail communication
- Recording employees telephone calls
- Medical checks or compulsory or random drug testing.

4.3.5 Article 10 – Freedom of Expression. The Public Interest Disclosure Act 1998 may be subject to the challenge of compatibility because there are only a limited number of disclosures which provide the “whistleblower” with protection and these disclosures must be to designated persons. Because of these restrictions the right to freedom of expression may be compromised. Confidentiality clauses in contracts may also be a breach of the right, although the courts and tribunals will probably take into account the purpose of the clause and the employee’s motive for breaching it.

4.3.6 All the above could infringe an individual's right to privacy and the right to respect for correspondence. However the rights provided for by Article 8 are "qualified" rights and can be overridden where there is 'justification'. For example monitoring e-mails could be justified because the purpose of the monitoring is to ensure that offensive/abusive e-mails are not sent thereby protecting the "rights and freedoms of others".

5 Procedures

5.1 Staff will be able to rely on the rights of privacy and family life, religion and free expression. For example, the use of CCTV in areas used by staff will need to be justified (e.g. as a security measure to prevent break-ins and assaults on staff; they should be no more intrusive than necessary.

5.2 HR policies and disciplinary procedures should be reviewed to ascertain whether they are "human rights compliant".

5.4 Very careful consideration will be given to the purpose of, and justification for random drug testing, e-mail monitoring, CCTV surveillance, the recording of telephone calls, staff dress codes/uniforms. Responsible staff will question whether such actions would breach any Human Rights Laws.

5.5 Where there is uncertainty as to the implications of the Act, reference should be made to the Office Manager, whose responsibility it will be to keep up to date with case law developments.

5.6 Ltd Limited will monitor the company’s compliance with its published procedures and keep those procedures under regular review.

Implementation

We have established a Business standards team within our company, who monitor any incidents or violations and communicate this any findings to the Directors. The Policy is also reviewed at the yearly Management Review Meeting. All staffs are given details of our policies and procedures as part of their induction when starting with the company. Any amendments or details on our progress are communicated in our Weekly Team meetings to staff.

Measurement of outcomes

We have had no violations reported in the past year either regarding staff or our suppliers. We have also been audited on our Human Resource procedure during our ISO 9001 and ISO 14001 re-certification and there were no non-compliances.

Labour

Assessment, policy and goals

The Company is an equal opportunities employer and is determined that no employee, potential employee or customer shall unlawfully receive less favourable treatment or be unlawfully discriminated against on the grounds of race, colour, nationality, ethnic or national origin, religion, belief, gender, sex, sexual orientation, marital status, disability, part-time status, age, trade union membership or non membership.

The Company will take all reasonable steps to recruit, employ and promote employees on the basis of ability, skill and qualification, without regard to any of the grounds referred to above. Employees will be given equal opportunities and, where appropriate, special training to progress within the organisation.

The Company is committed to a programme of action to make this policy fully effective. Relevant Legislation - The Equal Pay Act 1970 makes it unlawful to treat an employee less favourably, with regard to terms and conditions of employment, on account of his or her sex.

The provisions of the Act apply equally to men and women and covers discriminatory contract terms, it is not restricted to terms relating to "pay". The Sex Discrimination Act 1975 makes it unlawful to discriminate, directly or indirectly, on grounds of sex or marital status. Indirect sex discrimination can occur where a requirement or condition is applied equally to men and women. Such requirement or condition may discriminate indirectly because the proportion of one sex that can comply with it is much smaller than the proportion of the other sex that can comply with it. In a case of a complaint, an employer would be required to show that the requirement complained of is necessary for the job, irrespective of gender.

The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000, places on a Company a general duty to make appropriate arrangements with a view to securing that their various functions are carried out with due regard to the need:

- a) To eliminate unlawful racial discrimination; and
- b) To promote equality of opportunity and good relations between persons of different racial groups. It is unlawful to discriminate against a person, directly or indirectly, on grounds of race in the field of employment.

Examples of indirect discrimination would be recruiting from sources that exclude areas of high settlement of racial minority groups, or setting language tests or educational qualification levels above the minimum required for the post.

Under the Trade Union and Labour Relations (Consolidation) Act 1992, it is unlawful to discriminate on the grounds of trade union membership or non-membership.

The Disability Discrimination Act 1995, as amended from time to time, makes it unlawful to discriminate against an employee, either current or prospective, with a disability as defined by the Act and in circumstances that are covered by the Act because of a reason relating to the disability.

Under the Sex Discrimination (Gender Reassignment) Regulations 1999, it is unlawful to discriminate against an individual who is in the process of undergoing, or who has

undergone, gender reassignment.

Under the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000, it is unlawful for an employer to discriminate against an employee on the basis that he or she works part-time.

In general, a part-time worker is entitled to the same pay and benefits as a comparable full-time worker, but on a pro rata basis, and must not be excluded from access to training or treated less favourably in a redundancy situation.

Under the Employment Equality (Religion and Belief) Regulations 2003, the Employment Equality (Sexual Orientation) Regulations 2003 and the Employment Equality (Age) Regulations 2006 it is unlawful for an employer to discriminate on the grounds of religion, belief, sexual orientation or age.

Recruitment Advertising - All publicity material should reflect the Company's positive equal opportunity policy. It is the general policy of this Company that vacancies shall be advertised both internally and externally. Recruitment activity should not artificially restrict the number of applicants from any particular groups. Vacancies should be advertised widely, internally and externally.

Personal recommendations from existing employees as a primary or sole method of attracting applicants will not be permitted. All vacancies should be made known outside the Company through means that will give equal access to all sections of the community seeking employment. All advertisements must be clear and unambiguous to ensure that all applicants will be able to determine their own suitability. Where an advertisement states that for further information a candidate should contact a named Company official, this should be strictly limited to providing candidates with factual information concerning the qualifications, experience or other qualities that are required in accordance with the person specification.

This process should not be used as an unofficial screening or to deter 'would be' applicants. There should be no unnecessary restriction on posts being considered for job sharing and, where appropriate, advertised as such. Closing details in advertisements will state that the Company has a positive equal opportunities policy and welcomes applicants from all sections of the community. Initial Recruitment Selection for a short list must only be based on the information contained in the application form, using the person specification as the criteria. The criteria for initial selection must be consistently applied to all applicants. Where academic qualifications are one of the criteria for initial selection, these must be geared to the requirements of the particular job and not be artificially high. Overseas qualifications must also be accepted where they are equivalent.

There should be no artificial restrictions on the number from any minority group when selecting for a short list. The adoption of quotas is unlawful under the Race Relations Act 1976 and the Sex Discrimination Act 1975. Any disabled applicant meeting the criteria for initial selection must be interviewed, irrespective of any requirements to adapt facilities or buildings should they be successful.

Reasons for regretting a candidate or not selecting for a short list must be recorded for the purpose of recruitment monitoring. Recruitment Selection - Personnel responsible for interviews and selection should have received training in the field of interviewing,

including issues relating to equal opportunities. Interviewers must not ask questions:

- a) About personal circumstances unrelated to the requirements of the job, such as family commitment.
- b) About a candidate's reaction to a Manager of a different race or gender.
- c) Designed to test more vigorously certain candidates on the basis of gender, race or disability. In determining whether to regret a candidate, interviewers must only consider factors relevant to the job.

The criteria applied to the interview should be those listed in the job description. All application forms should be kept for 6 months after the end of the recruitment process. Where there is doubt about a disabled candidate's suitability for employment because of the nature of the disability, further advice should be sought as to the nature of the disability and the availability of aids to employment and/or grants for adaptation to buildings, if relevant, before a decision is taken. The positive qualities of candidates from the ethnic minority groups, for example, the ability to speak more than one language or cultural affinity with members of ethnic minority groups, should be given due weight, particularly in recruitment for posts which can involve contact with the public. Informal interviews must not take place unless they are clearly part of the formal selection process.

If any member of staff engaged in interviewing feels that discrimination has occurred in that selection process, the matter should be reported directly to his or her Manager.

Responding to Special Needs - The potential for job sharing posts will be considered. The Company's policies in respect of maternity leave and parental leave should be understood by the Managers and made known as appropriate.

The Company will look favourably, where reasonably practical, at varying or adapting working requirements to cater for the particular cultural and religious needs of minority ethnic groups. Training and Promotion - The Company recognises that training and development are essential to maximise the economy, efficiency and effectiveness of its workforce and will ensure that training needs within the Company are properly determined and adequately met.

All employees will have equal access to training and promotion opportunities provided by the Company and will be encouraged to take advantage of opportunities, which become available.

The Company will provide training opportunities that will allow employees to develop skills appropriate to their job and to further their career development.

All employees will be made aware of the Company's Equal Opportunities Policy for employment and the commitment contained therein regarding training. Staff involved in the recruitment and selection of external applicants or the recruitment and selection, including promotion, of current employees will receive appropriate training in equal opportunities.

Positive action training initiatives will be devised, where required, for targeted groups so that they are able to compete on an equal basis for vacancies and for promotion within the Company.

Other Personnel Procedures - It is unlawful to discriminate (e.g. on the grounds of race, religion, belief, sex, sexual orientation or disability) in the operation of grievance,

discipline or appeal procedures.

It should not be assumed that individual women, members of ethnic minority groups, or disabled persons who have complaints are over-sensitive about discrimination, nor should grievances be treated lightly or ignored. Unlawful discrimination, harassment or victimization will constitute gross misconduct and render an employee liable to summary dismissal.

Monitoring - It is good management practice to ensure that the Company's policies are being implemented effectively.

The Commission for Racial Equality of Practice for employment advocates that employers should monitor their Equal Opportunities policies. There can be cases where the Company's policies are ignored unconsciously and this could lead to a breach of the law. To safeguard against this it is essential that the Equal Opportunities Policy, particularly in relation to recruitment, promotion, training and transfer be effectively monitored.

The Company will adopt Equal Opportunities monitoring particularly in relation to recruitment and job applications from different ethnic groups. The monitoring data will not identify any individual. Accurate records will enable the Company to:

- a) Have reliable statistical data of the distribution groups within the workforce and identify changes over time;
 - b) Use the data in dealing with grievances;
 - c) Use the data for reviewing the Company's recruitment and selection process and make the necessary changes.
- Reviews and Responsibility - The Company will ensure that all aspects of the policy are kept under review in order to ensure its effectiveness. Selection criteria and procedures will be kept under review to ensure that individuals are selected, trained, promoted and treated on the basis of relevant merits and abilities and to ensure that they do not constitute or could lead to unlawful discrimination.

The responsibility for ensuring that the policy is upheld is with the Managers. If an employee considers that he or she is a victim of discrimination; he or she should raise the issue through the Company's Grievance Procedure. Grievance Procedure - Where staffs have a grievance relating to any aspect of their employment they should have no hesitation in raising this with their immediate Line Manager. This must be done in writing, setting out the grievance and the basis for it.

It is Ltd Limited's intention to consider all grievances as soon as possible and a meeting will usually be held within 5 days of raising the grievance. The meeting will enable the member of staff to give full details. Staff are entitled to be accompanied by a fellow employee or accredited trade union official at the grievance meeting. It may not be appropriate to take up the grievance with the Line Manager if the grievance is about that person. In this case staff should raise it with a more senior member of management at the same level.

After the meeting the Manager will inform them of his or her decision in response to the

grievance. All staff have the right to appeal against this decision. If they wish to appeal, they must inform Ltd Limited in writing. They will then be invited to attend another meeting, after which they will be informed of the final decision.

Implementation

Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.

Description of concrete actions taken by your company to implement labour policies, reduce labour risks and respond to labour violations.

The Company is committed to the principle that individuals should be selected, promoted and treated on the basis of their relevant aptitudes, skills and abilities.

Managers have duties under the policy:

- Not to unlawfully discriminate in the course of employment against job applicants, employees, customers, suppliers, or members of the public with whom contact is made;
- Not to induce or attempt to induce others to practice unlawful discrimination;
- To bring to the attention of employees that failure to adhere to the policy will be regarded as a disciplinary offence, which in the case of a serious offence would amount to gross misconduct. All employees have duties under the policy: -

- Not to unlawfully discriminate in the course of their employment against fellow employees, customers, suppliers or members of the public with whom contact is made;
- Not to induce or attempting to induce others to practice unlawful discrimination;
- To report any unlawful discrimination to the Management.
- Not to employ any child labour or encourage this when dealing with any other affiliated company.

To also investigate any such violations. It is the responsibility of Directors along with the Office Manager, to ensure that all legislation is adhered to and our Business Standards Team work closely with our supply chain to ensure that they work on the same principles as Ltd, encouraging improvement and offering help and advice.

Our Policy is reviewed on a yearly basis and discussed in the Management Review meeting. Ltd Limited expects its suppliers to prohibit forced or compulsory labour in all its forms.

Ltd Limited expects its suppliers not to employ:

- (a) Children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and
- (b) Persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, are likely to harm the health, safety or morals of such persons.

Measurement of outcomes

We have a diverse workforce at Ltd and understand that valuing people helps towards a sustainable business. We take any complaints very seriously and they are investigated thoroughly and all findings presented to the Directors to ensure that the necessary action is taken.

To date, no complaints have been filed against us. We carry out an initial induction with all staff and ensure that all staff not only receive fair pay and regular rises when possible, but adequate training to carry out their job to the best of their ability. Our Human Resource procedures are audited internally regularly and have also been audited by an External company with no non-compliances.

Environment

Assessment, policy and goals

LTD Limited understands that our operations impact upon the local and global environment and we as a company are committed to not only minimising these impacts, but also continually improving year on year.

We commit to prevent pollution to air, water and land from our operations and comply with environmental laws and regulations, and other requirements to which Ltd subscribes.

We have implemented an Environmental Management System to ISO14001 standard. As part of this process we have undertaken an environmental review and identified our significant environmental aspects and commit to put in place initiatives to reduce these. We will engage our clients on all projects about the benefits of printing graphics, which have a lower environmental impact. We also commit to dialogue and engagement with all our employees and sub-contractors about the importance of environmental management to LTD.

LTD also will engage its supply chain about the potential for using alternative materials, which have a lower environmental impact.

Although LTD strives to minimise our impact on the environment we are conscious that we cannot eliminate all negative effects. As part of this we are offsetting our carbon footprint via Carbon Footprint (as recommended by Greenpeace, Friends of the Earth and WWF).

LTD is passionate about minimising our effect on the environment and actively seeks to share our knowledge on this with others. This influences the way in which we engage with our clients, our suppliers and the community work which we are involved with – seeking to share information on sustainable printing and the wider benefits of being an environmentally responsible organisation.

We look also to:

- Minimise the environmental impact of its graphics printing techniques beginning with undertaking a baseline review of printing techniques by mid-2014 and investigate alternatives to printing inks with high levels of VOCs to see if this type of printing can be phased out completely, undertaking review of the use of current print media and investigate the use and roll-out of alternatives to printing on vinyl.
- Implement a sustainable procurement procedure for all office supplies, printing substrates and finishing materials and for the procurement of external printing (e.g. marketing materials)
- Engage our waste contractors to achieve 100% diversion of materials from landfill
- Apply the waste hierarchy to all of our operations (following preference for prevent, reuse, recycle)
- Put in place systems for ongoing monitoring and measurement of energy, water and

waste. These initiatives will help us identify further ways to reduce our environmental impact including our carbon footprint.

- Derived a suitable list of objectives and targets for continual improvement in the EMS and plans and programmes to achieve these. These will reflect the significant environmental aspects, which have been identified.

Implementation

We have successfully achieved ISO14001 certification this year. We provide Information on our Environmental policy during the initial Induction when staffs join.

We also give regular presentations on new innovative and environmentally friendly products and encourage staff to attend seminars and exhibitions showcasing new technology.

Objectives have been set across all departments and are monitoring and reviewed during the Monthly Managers meeting. We are please that all targets are on track to be achieved by the end of this year.

Measurement of outcomes

We have implemented a procedure to investigate any environmental incidents that occur These must be reported to the Environmental representative, who will then explore the root cause and consider what actions needs to be taken in compliance with all legislation. To date there have been no incidents.

Anti-Corruption

Assessment, policy and goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Learn to Dream employees or by third parties acting for or on behalf of Learn to Dream Limited.

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate; action may be taken against parties involved, which may result in dismissal, or the cessation of any business arrangements with our suppliers.

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly. No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from your Manager. An employee or anyone working on our behalf without receiving prior written approval from a Manager should accept. Similarly, no gift or offer of hospitality.

Implementation

All policies are communicated to new staff during the initial induction and all amendments to the policies are communicated to all staff during the weekly Team meetings.

The Manager of every instance in which gifts will make a record or hospitality are given or received. As the law is constantly changing, this policy is subject to review and the Business Standards team discusses any amendments to the document during the yearly Management Review meeting.

Measurement of outcomes

If any staffs working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if they are not personally involved, are expected to report this to the Office Manager.

They may be asked to give a written account of events. This is then investigated and findings reported to the Directors for appropriate action.

Staffs are reminded of the Company's Whistleblowing Policy, which is available in this Employee Handbook.