

# LABOUR & HUMAN RIGHTS REPORT 2022/2023

## Introduction

This is the first Labour and Human Rights report published by Commercial Corporate Services Ltd<sup>1</sup>, reporting against the 2022-2023 financial year. The scope of this report covers our 300+ employees working within all three of our offices: Cheltenham, London, and Leeds, and includes the following subsidiaries:

- Commercial Ltd<sup>2</sup>
- Commercial IT Services Ltd<sup>3</sup>

Commercial is fully committed to upholding the labour and human rights of all its employees. To continually achieve this, Commercial guarantees an advanced status on annual Communication on Progress (COP), which follows the guidelines of the Global Reporting Index (GRI) and United Nations Guiding Principles (UNGP) on Business and Human Rights. As a result, Commercial implements the UNGP's three pillars within our internal business operations:

1. Protection of Human Rights
2. Respect of Human Rights
3. Access to Remedy for victims of business-related abuses.

The aim of this report is to expand our reporting scope, enhancing the transparency of our internal operations and its alignment to labour and human rights regulations.

## Company Overview:

Commercial are business transformation specialists who inspire the best businesses to become better, for the benefit of people and the planet, profitability, and growth. Our comprehensive suite of products and services have been meticulously customised to tackle the distinct challenges of the ever-shifting business landscape. We are committed to minimising our negative, and maximising our positive impacts on our employees, the environment, wider community and supply chains.

## Our Business Responsibilities & Internal Operations:

At Commercial, we want to ensure best practice for labour and human rights throughout the entirety of our workforce's employment, starting at the very beginning of our recruitment process, through to onboarding and even offboarding at Commercial.

We remain vigilant with legal and compulsory requirements, as per our Health and Safety Management System. At Commercial, we always want to go above and beyond the standard protocol, especially when it comes to inclusivity and our employees' welfare. Thus, in 2017, Commercial became a Living Wage Employer, accredited by The Living Wage Foundation, to ensure all employees received fair monetary value for their work. In addition, Commercial proudly holds a Disability Confident Level 2 Employer accreditation, for our continual efforts to ensure those with disabilities and long-term health conditions are given equitable opportunities, helping them to fulfil their potential.

Striving to be the most socially responsible business we can be, we always want to hold ourselves accountable, especially in relation to labour and human rights. Therefore, we utilise independent third parties to audit and verify our internal operations. The relevant third parties are listed below:

- British Standards Institution (BSI) - External Auditor for our Management Systems
- Ethical Trading Initiative (ETI)
- EcoVadis
- Loop – Social Value

VERSION 2022/2023

Employer Liability Insurance Certificate:



**Certificate of Employers' Liability Insurance (a)**

(Where required by regulation 5 of the Employers' Liability (Compulsory Insurance) Regulations 1998, one or more copies of this certificate must be displayed at each place of business at which the Policyholder employs persons covered by the Policy)

**Policy Number** 100574438CCI  
**Name of Policyholder** Commercial Corporate Services Ltd, Commercial Limited & Commercial IT Services Ltd  
**Date of Commencement of Insurance** 27 September 2023  
**Date of Expiry of Insurance** 26 September 2024

We hereby certify that subject to paragraph 2

- (1) the Policy to which this certificate relates satisfies the requirements of the relevant law applicable in Great Britain, Northern Ireland, the Isle of Man, the Island of Jersey, the Island of Guernsey and the Island of Alderney (b)
- (2) the minimum amount of cover provided by this Policy is no less than £5million (c)

Signed on behalf of: **Aviva Insurance Limited** (Authorised Insurer)

Authorised Signatory  
 Adam Winslow  
 CEO, UK & Ireland General Insurance

Notes

- (a) Where the employer is a company to which regulation 3(2) of the Regulations applies, the certificate shall state in a prominent place, either that the policy covers the holding company and all its subsidiaries, or that the policy covers the holding company and all its subsidiaries except any specifically excluded by name, or that the policy covers the holding company and only the named subsidiaries.
- (b) Specify applicable law as provided for in regulation 4(6) of the Regulations.
- (c) See regulation 3(1) of the Regulations and delete whichever of paragraphs 2(a) or 2(b) does not apply. Where 2(b) is applicable, specify the amount of cover provided by the relevant policy.

Aviva Insurance Limited. Registered in Scotland, No. 2116. Registered Office: Pitheavlis, Perth PH2 0NH.  
 Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

## Policies & Procedures

Commercial have a number of documented policies and procedures that set out the manner in which our business operations and activities are to be conducted, in order to meet legal and regulatory requirements. Copies of all our documented policies and procedures are available upon request. In addition, to ensure effective communication of these policies and procedures, all employees can request them to be translated into their required language.

### Health & Safety Policy:

Within our Health and Safety Policy, Commercial ensures, so far as is reasonably practicable, the health and safety of all our employees, suppliers, and visitors in the working environment under its control and to protect others from harm arising from Commercial's operations. To continually achieve this, Commercial ensures significant time, financial resources and any other additional resources necessary are provided.



**HEALTH AND SAFETY STATEMENT**

Commercial acknowledges its legal and moral obligations to comply with all current Health and Safety Legislation and other requirements, see Section 2 of the Health and Safety at Work etc., Act 1974, to provide and maintain safe and healthy working conditions.

It is the Group's policy to ensure, so far as is reasonably practicable, the health and safety of all its employees, suppliers, and visitors in the working environment under its control and to protect others from harm arising from the Group's operations. To achieve this aim, the Group commits to providing time, money, and any other resources necessary.

Our employees will be supervised in their work and given information and training to ensure their safety. Employees are encouraged to be responsible for the health and safety of all their fellow employees, whoever they are and whatever their role. Risk assessments will be conducted where necessary and safe systems of work implemented, which will be reviewed regularly by a competent person.

Management and employees play a vital role in our health and safety arrangements, and everyone has a legal duty to co-operate in health and safety related matters, not to endanger themselves or others or to misuse any resource provided for safety. Compliance with the Group's Health and Safety Policy is a condition of employment.

Whilst on our premises, visitors will be accounted for and made aware of our health and safety arrangements. Our premises will be maintained, so far as is reasonably practicable, free from risks to employees and visitors.

This statement was approved by all board members and will be reviewed annually.

Signed 

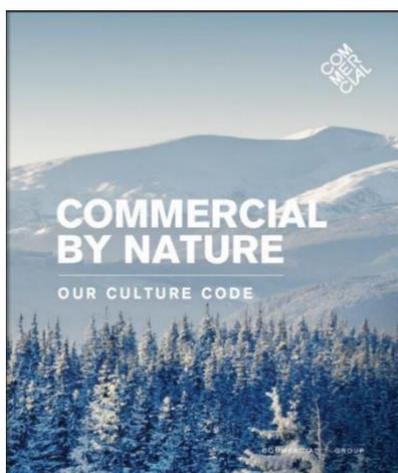
Date January 2023

Our Health and Safety Policy Statement is publicly available on our [website](#).

## Culture Code: Our Employee Handbook

At Commercial, we have a zero-tolerance policy with regards to matters of harassment, discrimination, modern slavery, bribery, inequalities, and any other act that may make an individual feel uncomfortable or at risk of danger. We want all our employees to be fully aware and understand their labour and human rights when it comes to their working environment and job contracts. Therefore, to be fully transparent, we produced our 'Culture Code', an employee handbook that informs all employees of their expected behaviours and labour rights, as well as the informal and formal procedures in place for their protection including:

- Anti-bribery and Anti-corruption
- Anti-harassment and Bullying
- Working Conditions and Hours
- Equality & Diversity Policy: Anti-discrimination
- Grievance Procedure



Each employee is provided with a copy of the Culture Code during their onboarding process, to ensure their awareness and understanding prior to starting their role. All employees also have access to a digital copy via our asset management system ResourceSpace.

### Anti-bribery & Anti-corruption:

Commercial is committed to instilling a strong anti-corruption culture and to upholding all laws relevant to countering bribery and corruption including, but not limited to, The Bribery Act 2010. Thus, our Anti-bribery and Anti-corruption policy applies to our employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with Commercial.

The purpose of this policy is to set out the responsibilities in observing and upholding Commercial's position on bribery and corruption and to provide information and guidance to those working for us, on how to recognise and deal with bribery and corruption issues. All employees receive anti-bribery and anti-corruption training as part of their induction process at the beginning of their employment. All existing employees receive regular and relevant training when required.

Commercial monitors and reviews, at least annually, the effectiveness and the implementation of this policy to ensure its suitability and adequacy. If any improvements are identified, amendments and/or action is undertaken as soon as possible.

### Anti-harassment & Bullying:

Commercial works to ensure all employees are provided with a working environment that respects the individual rights of each employee and where colleagues treat each other with respect. Any behaviour that undermines this will not be tolerated. This includes the harassment or bullying of job applicants, employees, contractors, agency workers, self-employed and ex-employees.

All employees are informed about acceptable and unacceptable behaviours, and the process of which victims of harassment and bullying should follow, which includes both informal and formal procedure solutions.

### Working Conditions & Hours:

Commercial acknowledges its legal and moral obligations to comply with all current health and safety legislation and requirements in order to provide and maintain safe and healthy working conditions. For example, contracted working hours vary depending on the individual employee's contract, but will always be aligned to or less than the daily/weekly legal limits set for the varying age bands, and will never be on a zero-hour contract. In addition, all employees working for six or more hours a day are entitled to an unpaid lunch break of up to an hour. During this time, employees are strongly encouraged to take time away from their desks, particularly to get some fresh air and move around. Commercial also has 'working hour: pre-warning' systems in place, which monitor employees' hours to ensure that they are not working excessive hours to the detriment of their health and wellbeing.

We also understand the importance of a healthy Work-Life balance, which is why we ensure all employees have a day-one right to family-friendly and flexible working arrangements. For example, our 'Flexi Time' allows all employees to have up to half a day off of work once a month, without using their holiday allowance, giving employees the ability to easily attend doctor appointments, school events etc. Commercial also believes that long service deserves a reward, which is why employees receive one extra day of annual leave for every five full years of completed service, on top of the 25 days all employees are entitled to (plus statutory bank holidays).

All employees receive their salaries at the end of the last working day of the month, by direct credit transfers. For atypical working hours, employees are paid at a rate of a time and half or double. In addition, Commercial recognises that sickness is unavoidable, and does not want its employees to be financially disadvantaged or become stressed as a result of their absence. Thus, our employees are entitled to company sick pay, dependent upon their length of service, after the completion of their probationary period. Company sick pay does not impact an employee's right to receive Statutory Sick Pay (SSP) for the same absence period, although any company sick pay received will be inclusive of any SSP due.

### Equality & Diversity Policy: Anti-discrimination

At Commercial, we value the contributions of a diverse workforce and recognise that everyone is different, with something unique to offer. Our aim is to continually enhance our workforce to be a true representation of all sections of society and that each employee feels respected, treated fairly and able to reach their full potential. By respecting and making the most of everyone's talents, we maximise our efficiency, creativity, and customer interactions.

Our Equality Diversity Inclusion (EDI) policy ensures equal opportunities and treatment of any employee regardless of their age, gender, race, colour, nationality, ethnic origin, sexual orientation, marital status, gender reassignment, religion or belief, disability, pregnancy, maternity, part time status and trade union membership. Failure to adhere to this policy may result in disciplinary action, which could result in dismissal.

### Grievance Procedure:

Treating all employees fairly and with respect is an important commitment to Commercial. However, employees may, from time to time, have concerns or complaints regarding their work, working relationships or the working environment. Commercial want to ensure that any problems raised or identified are dealt with promptly, fairly, and consistently. Thus, our Grievance policy is in place to encourage free communication between employees and their managers, to ensure that questions and problems arising throughout the course of employment can be aired and, where possible, resolved

quickly and informally. People and Culture (our HR department) are also available for all and any employees that may feel they are unable to directly approach their line manager. Under this policy, employees are also able to raise a formal grievance, when attempts to resolve the matter informally do not work. The formal grievance procedure is laid out in our culture code, which highlights Commercial’s support of all employees’ to be accompanied by a trade union representative or a fellow worker at any grievance or disciplinary hearing.

**Modern Slavery:**

At Commercial, we are committed to the elimination of modern slavery in any form, throughout our entire operations. This is achieved through an active and collaborative approach with all our employees, clients, suppliers, and partners. We annually review and publish a Modern Slavery Statement, in accordance with the Modern Slavery Act 2015, which is publicly available on our website. As part of going above and beyond the legal requirements, Commercial includes our internal operational controls within our Modern Slavery Statement, please see below relevant stats:

Commercial (Cheltenham, London, Leeds)	Financial Reporting Year		
	2020-2021 (18 Months)	2021-2022	2022-2023
Child Labour	0	0	0
Forced Labour	0	0	0
Human Trafficking	0	0	0

Please see page 10 of Modern Slavery Statement for more information on our Risk Assessment of Modern Slavery. Please see our website for our latest Modern Slavery Statement.

**Our Management Systems:**

Our management systems are externally audited, independently assessed and certified by BSI. All of Commercial’s policies and procedures have all been developed to comply with the requirements of the following ISO standards:

ISO 14001: Environmental Management

ISO 9001: Quality Management Systems

ISO/IEC 27001: Information Security Management

ISO 45001: Health & Safety Management (To be obtained in 2024)

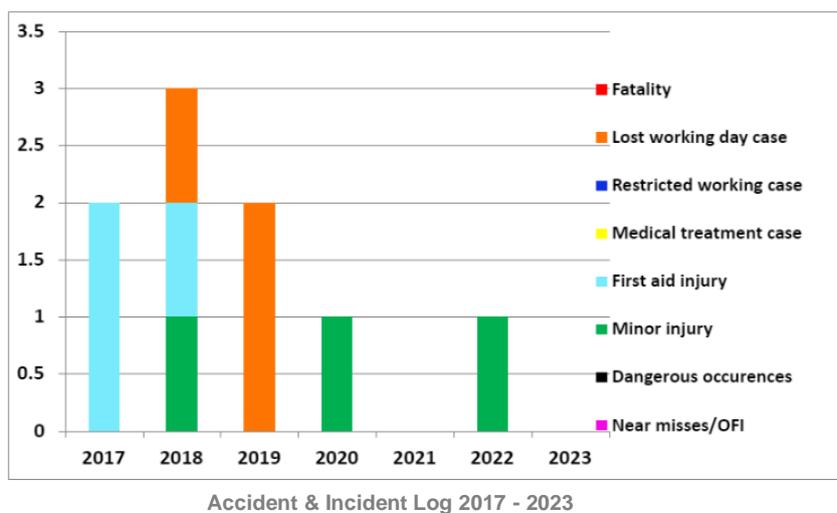


## Health & Safety at a Glance

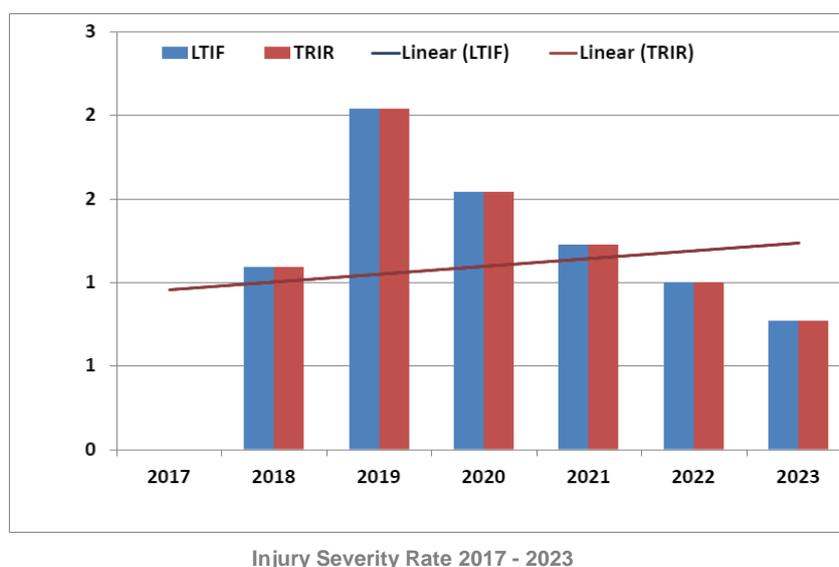
With all the above policies and procedures in place, Commercial tracks and monitors the associated data to ensure compliance and to identify potential areas of improvements. This enables Commercial to continually progress the health and safety of all our employees, their working conditions and working environments.

### Accident & Incident Report Log:

The frequency and severity of accidents and incidents endured by all employees, occurring at any of our on-site premises, in addition to any off-site premises, have never been a major call for concern as Commercial is an office-based company, which means the work carried out by employees is often low risk and requires no handling of hazardous substances and/or chemicals. This is evident with only nine accidents and incidents being logged over a seven-year period.



The worst type of accident and incident that has been endured by our employees has been 'lost working day' cases, which total to three out of the nine logged cases from 2017 to 2023. However, since 2019, no more have occurred, it has only been minor injury cases. The rise in logged cases in 2022, after zero cases in 2021, may have resulted from the move back to 'normal' business operations, post-covid recovery. Please see graph below for our injury severity rates:



## Working Conditions & Training:

Commercial goes beyond the physical health and safety of its employees, we track and monitor the mental welfare of our employees as well as identify the ways in which we can support them at work and with the balance of their personal lives.

Commercial (Cheltenham, London, Leeds)	Financial Reporting Year		
	2020-2021 (18 Months)	2021-2022	2022-2023
Annual Staff Turnover (%)	24.6	25.8	25
Employees rating the working environment as clean, comfortable & effective (%)	X	X	63.3
Number of Health & Safety Certificates	35	26	14
Number of Counselling Sessions	80	150	100
Number of Mental Health First Aiders	4	4	7
Hours of Volunteering	28	90	157.5

Commercial's annual staff turnover has remained fairly consistent over the past three reporting years, staying at around 10% lower than the UK's annual national average (35% in 2023<sup>4</sup>). Commercial are fully aware that a working environment can impact the physical as well as the mental wellbeing of employees. Thus, at the end of the 2022-2023 reporting year, questions centred around the working environment were incorporated into our annual employee satisfaction survey. This allowed us to see that 63.3% of our employees found the current working environment to be clean, comfortable, and effective; but it also provided insightful feedback on how our working environment can be enhanced to deliver the best employee experience going forward.

The health and safety of all employees, regarding both their physical and mental welfare, is of utmost importance at Commercial. As a result, employees attend relevant health and safety training courses each year to ensure they are fully aware and knowledgeable on the best practices and requirements needed to complete their day-to-day job roles safely. These courses have included, but are not limited to, Manual Handling training, Fire Marshall training, Vehicle Operations Safety, National Examination Board in Occupational Safety and Health (NEBOSH), etc.

Commercial also want to ensure all employees always have someone to turn to, whether it's about their work or personal lives, which is why counselling sessions and mental health first aiders are available to all employees, from the moment their employment begins. Providing adequate mental health support is a must at Commercial, which is why three additional members of staff were mental health first aid trained throughout the 2022-2023 period. In addition, Commercial believes in supporting causes close to the hearts of our employees, or that can make transformative change, which is why we continually encourage staff to utilise their entitled volunteer day, evident with the increasing volunteering hours from 2021 to 2023.

Please see our Pay Gap Report for more information on our Equality, Diversity and Inclusion initiatives and statistics.

## Health & Safety: Key Performance Indicators

### Accident & Incident Report Log:

With Commercial's most recent reporting year (2022-2023) having zero logged accidents and incidents, it is our target to ensure zero accidents occur year-on-year. To ensure this target is met, the following actions will be implemented:

- **Obtaining ISO 45001 accreditation by 2024:** An audited health and safety management system will guarantee effective risk assessments are carried out, appropriate PPE is distributed, and training is always up to standard, which in turn should keep accidents and incidents to a minimum.
- **Communication with employees:** Ensure 100 percent of all employees have attended or watched the recordings of all Health and Safety focused learning days. A minimum of one company-wide Health and Safety learning day will be given a year.
- **Additional communication with van drivers and off-site employees:** In addition to the above KPI, ensure 100 percent of van drivers and offsite employees attend weekly catchups with their line managers on their wellbeing and health and safety protocols, specific to their field of work.

### Working Conditions & Training:

Reflecting upon the analysis of our working conditions and training measures, Commercial understands there is always more that can be done to help and support our employees. Thus, with Commercial wanting to be the best business it possibly can be, the following targets will be implemented:

#### Working Environment & Annual Staff Turnover

- **Enhance social dialogue:** Health and Safety committee meetings to be held every financial quarter, giving every employee, both junior and senior, the ability to raise concerns and impact outcomes. In addition, an anonymous employee satisfaction survey to be sent out annually.
- **Improve working environment and conditions:** Ensure a minimum of 80 percent of all employees perceive the working environment to be clean, comfortable, and effective. Commercial's annual employee satisfaction survey will continue to monitor employee perception of our working environment and areas for improvements.
- **Improve annual staff turnover:** Whilst being a natural by-product of the above target, we will also actively work towards ensuring our annual staff turnover remains below the UK average (35% in 2023<sup>4</sup>).

#### Training

- **Improve training of employees:** Ensure 100 percent of employees (including sub-contractors) receive health and safety induction training as well as additional health and safety training relevant to their role. The total number of inductions attended, and training certificates awarded year-on-year will continue to be monitored and tracked. This will also be enhanced to include alerts on certificate expiry dates, ensuring plenty of time for renewal.

## Mental Health Support

- **Ongoing mental health support:** Maintain our current partnership with Help@Hand and continue to communicate the offering to 100 percent of employees to ensure their awareness of their entitlement to the service. This communication will be incorporated into our onboarding process and PDRs, monitored annually by People & Culture.
- **A minimum of two mental health first aiders:** Always ensure that a minimum of two members of staff are mental health first aid trained. Any changes to those qualified or how to contact them will be communicated to all employees as soon as possible.

## Work-Life Balance Support

- **Improve employee volunteering:** Reach a minimum of 50 percent of all employees utilising the volunteer day initiative. Identify the barriers to employees taking up the scheme and work towards eliminating those barriers. The number of volunteer days taken will continue to be tracked and monitored year-on-year. Our People & Culture team will also enhance the variety of company planned volunteer days and increase the level of encouragement for all employees to help a cause close to their heart.

## Modern Slavery:

With a history of having no internal cases of child labour, forced labour and/or human trafficking, Commercial wants to ensure it stays that way. Thus, the practices listed below will continue to be followed and carefully monitored:

- **Proof of Right to Work:** Our recruitment and onboarding process will continue to require proof of Right to Work in the UK from 100 percent of successful candidates, or employment will not go ahead. This includes temporary, part time, full time and/or subcontractors. Copies will be obtained, recorded, and monitored.
- **DBS Checks:** The continuing of 100 percent of all successful candidates undergoing a DBS check, to ensure Commercial makes safe and informed recruitment decisions that support the safety and welfare of its employees. This includes temporary, part time, full time and/or subcontractors and will be measured through the tracking of recorded DBS checks and documents obtained from each employee.

This report has been approved by all board members and will be reviewed and updated annually.

Signed: Arthur Hindmarch (Chairman)



Date: October 2023