

INTRODUCTION

This is the second Labour and Human Rights report published by Commercial Limited (Commercial)¹, reporting against our 2023-2024 financial year. The scope of this report covers our 280+ employees working within all three of our offices: Cheltenham, London, and Leeds.

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 compliance 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 and Internal Operations:


At Commercial, we want to ensure best practice for labour and human rights throughout the entirety of an individual'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 ISO 45001 Health and Safety Management System, certified by British Standards Institution (BSI). At Commercial, we always want to go above and beyond the standard protocol, especially when it comes to inclusivity and our employees' welfare. 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 is proud to hold a Disability Confident Level 2 Employer accreditation, for our continual efforts to ensure those with disabilities and long-term health conditions are given equal 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
- Social Value Consultancy

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 and wholly owned subsidiary Commercial Limited
Date of Commencement of Insurance	27 September 2024
Date of Expiry of Insurance	26 September 2025

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)



Jason Storah
CEO, UK & Ireland General Insurance
(Authorised Signatory)

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.

² UK Annual National Average Turnover: CIPD, 2024

POLICIES AND 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 and 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. Management and employees work on setting and monitoring of health and safety objectives for the company. Effective communication of and consultation on Health and Safety throughout the company.

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 

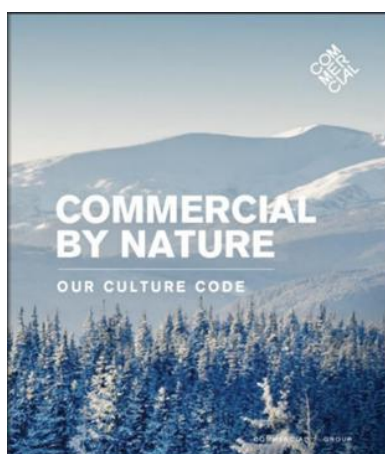
Date February 2024

Our annual 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 and 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, and our internal HR platform, BambooHR.

Anti-bribery and 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. 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. Once completed, Our People and Culture Team (Human Resources) are notified and the revised policy is republished to all employees via BambooHR.

Anti-harassment and 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. This policy extends to work-related functions outside of normal working hours, either on or off Company premises. 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 which victims of harassment and bullying should follow, which includes both informal and formal procedure solutions.

Commercial monitors and reviews, at least annually, the effectiveness and the implementation of this policy to ensure compliance, suitability and adequacy. If any improvements are identified, amendments and/or action is undertaken as soon as possible. The revised policy is republished to all employees via BambooHR.

Working Conditions and Hours:

Commercial acknowledges its legal and moral obligations to comply with all current health and safety legislation, as well as its requirements 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.

With the rise in remote and hybrid working, it is crucial for companies to ensure that employees working from home have suitable and safe working environments, particularly concerning Display Screen Equipment (DSE). All new employees are required to complete a DSE assessment and training to understand best practice and to allow Commercial to identify any necessary adjustments or additional equipment needs. Expectant mothers will receive a reassessment and any employee experiencing a change in their working conditions and/or environment can request a reassessment.

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. To ensure all new parents have our full support, we also offer enhanced paternity and maternity leave, which includes additional support to female workers once they return from maternity leave. In addition, Commercial 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 time-and-a-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. Therefore, 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.

Commercial also considers its employees to be an asset to its continued success and strives to ensure that no employee is financially disadvantaged as a result of layoffs. When layoffs are unavoidable, Commercial ensures full compliance with all applicable legislation.

Equality and 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. 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 review and publish an annual Modern Slavery Statement, in accordance with the Modern Slavery Act 2015. 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 statistics:

Commercial (Cheltenham, London, Leeds)	Financial Reporting Year			
	2020-2021 (18 Months)	2021-2022	2022-2023	2023-2024
Child Labour	0	0	0	0
Forced Labour	0	0	0	0
Human Trafficking	0	0	0	0

Please see pages 13-14 of our Modern Slavery Statement for more information on our Risk Assessment of Modern Slavery. Our Modern Slavery Statement is publicly available on our [website](#).

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: Occupational Health & Safety Management



HEALTH AND SAFETY AT A GLANCE

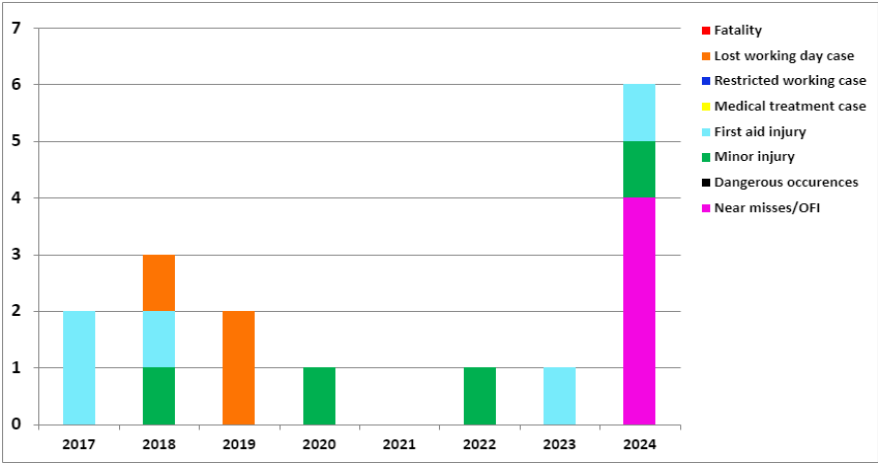
With all the above policies and procedures in place, Commercial tracks and monitors the associated data to ensure compliance and to identify potential areas of improvements. This enables Commercial to continually progress the wellbeing, health and safety of all our employees, their working conditions,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

Accident and 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 minimal handling of hazardous substances and/or chemicals. This is evident with only twelve accidents and incidents being logged over an eight-year period.

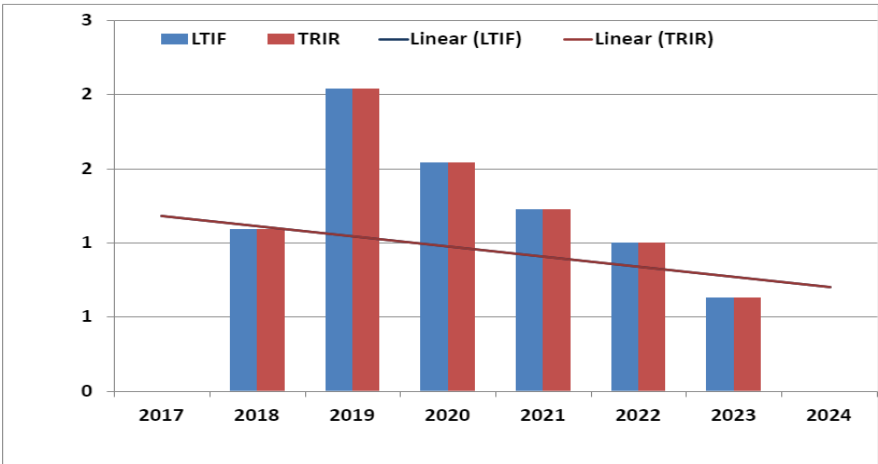
Commercial avoid COSHH (Control of Substances Hazardous to Health) products where possible and are working actively to find sustainable alternatives. While this transition is ongoing, we ensure compliance with HSE regulations by securely storing all identified COSHH products in a designated COSHH cabinet and maintaining a complete COSHH library, including risk assessments. Additionally, COSHH training is tracked and monitored for all employees handling these substances/chemicals.

LABOUR AND HUMAN RIGHTS



Accident & Incident Log 2017 - 2024

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 twelve logged cases from 2017 to 2024 (please see graph above). However, since 2019, no such incident has occurred, it has only been ‘minor injury’ or ‘first aid 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. In 2024, Commercial held a Health and Safety-focused learning day, which emphasised the importance of employees completing and filing near-miss reports. This explains the increase in cases of near misses and Opportunities for Improvements (OFIs) in 2024. Please see graph below for our injury severity rates:



Injury Severity Rate 2017 - 2024

Explanation	Acronym	2023	2024
IOGP LTIF, lost time injury frequency, is fatalities and lost work day cases per million man hours, on a 12 month rolling average (over 5 years)	LTIF	0.6	0.0
IOGP TRIR, total recordable injuries rate, is fatalities, lost work day cases, restricted work day cases and medical treatment cases per million man hours, on a 12 month rolling average (over 5 years)	TRIR	0.6	0.0

² UK Annual National Average Turnover: CIPD, 2024

Work-related Ill Health:

The health and safety of all employees, regarding both their physical and mental welfare, is of utmost importance at Commercial. We never want an employee to experience ill-health as a result of doing their day-to-day job roles. Therefore, in compliance with our ISO 45001, all applicable Personal Protective Equipment (PPE) and training is distributed to all requiring employees. During 2023-2024, this included, but was not limited to, dynamic risk assessment training to equip those in operational roles with the skills and understanding to identify hazards, assess risks, and take appropriate actions to eliminate or minimise risks.

Commercial is committed to ensuring that no employee faces work-related challenges alone, particularly concerning their mental and physical health. To provide a robust support network, the company established a Health and Safety Committee in 2023-2024. The committee holds quarterly meetings open to all employees, regardless of seniority, offering support, advice, and a direct communication pathway to board members. Any concerns raised are promptly addressed with immediate action. For information on additional mental well-being support, please see the next section 'Working Conditions and Training'.

In 2023-2024, Commercial also began monitoring and tracking the number of work-related ill-health cases. This provides better visibility of our employees' physical and mental welfare and enables prompt and efficient action to be taken if a work-related ill health case were to arise. Please see below for Commercial's work-related ill-health figures:

Commercial (Cheltenham, London, Leeds)	Financial Reporting Year	
	2022-2023	2023-2024
Number of Work-related Ill Health Cases	X	0

Working Conditions and Training:

Commercial goes beyond the physical health and safety of its employees, we also 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	2023-2024
Annual Staff Turnover (%)	24.6	25.8	25	29.5
Employees rating the working environment as clean, comfortable & effective (%)	X	X	63.3	78.4
Number of Health & Safety Certificates	35	26	14	58
Number of Counselling Sessions	80	150	100	143
Number of Mental Health First Aiders	4	4	7	7
Hours of Volunteering	28	90	157.5	202.5

Commercial's annual staff turnover for 2023-2024 was 29.5%, our highest turnover rate over the past four reporting periods. However, an increase of 4.5%, against the 2022-2023 period, does not raise a significant cause of concern as we are still remaining consistently below the UK's annual national average (34% in 2024¹). Commercial are fully aware that a working environment can influence employee turnover and impact the physical, as well as the mental, wellbeing of employees. Therefore, at the end of the 2022-2023 reporting year, questions centred around the working environment were incorporated into our annual employee satisfaction survey. We are pleased to see that within the 2023-2024 survey, 78.4% of employees found their current working environment to be clean, comfortable and effective, a 15.1% increase from 2022-2023. The survey also provided us with insightful feedback on how our working environment can be enhanced, which we will incorporate into our Cheltenham HQ refurbishment plans to ensure the best employee experience going forward. As already mentioned within this report, 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. In 2023-2024, we enhanced this coverage by implementing New Starter Risk Assessment training to ensure all line managers identify and schedule all applicable Health and Safety training prior to a new employee's start date, enabling day-to-day job roles to be completed correctly, and safely, from day one. These courses have included, but are not limited to, Manual Handling training, Fire Marshall training, Vehicle Operations Safety, Electrical Safety and Ladder Safety, Institution of Occupational Safety and Health (IOSH) 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 we ensure there are always seven employees that are trained Mental Health First Aiders. 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 2024.

Please see our Pay Gap Report for more information on our Equality, Diversity and Inclusion initiatives and statistics. Available on our [website](#).

² UK Annual National Average Turnover: CIPD, 2024

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KEY PERFORMANCE INDICATORS

Key Performance Indicators 2023-2024: Results

In last year's report, Commercial set key performance indicators (KPIs) focusing on internal Health and Safety, Working Conditions and Training, and Modern Slavery. Please see the table below for a review of our results for the 2023-2024 reporting period:

Commercial (Cheltenham, London, Leeds) Financial Reporting Year 2023-2024			
Category	Key Performance Indicator	Results	Progress
Accident & Incident Report Log	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.	In February 2024, Commercial successfully completed Stage 2 of the BSI ISO 45001 audit and now has a certified ISO 45001 Occupational Health & Safety Management System.	
	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.	Commercial hosted a total of six health and safety-focused learning days during the reporting period, covering topics such as the importance of Health & Safety, Neurodiversity, PPE, and Financial Wellbeing. Each learning day was offered on two different days of the week to ensure all employees had the opportunity to attend. Recognising that attendance may be affected by meetings, annual leave, and other commitments, Commercial always provided access to recordings and all relevant materials. This approach will continue for the 2024-2025 reporting period.	
	Additional communication with van drivers and off-site employees: 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.	Over the reporting year, weekly catch-ups were deemed impractical and were changed to a monthly occurrence. During these 1-2-1s, Line Managers reviewed and discussed the performance and incident data collected that month. This ensured van drivers and offsite employees were following best practice and prioritising their wellbeing. Best Practice was required to be read and confirmed each month. Commercial also continued to utilise the 'Achieve Programme' on Fleet Services to provide ongoing driver training.	
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.	The Health and Safety Committee held its first quarterly meeting in October 2023 and has continued to meet every quarter throughout the 2023-2024 financial year.	
	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.	78.4 percent of all employees perceive the working environment to be clean, comfortable, and effective. Although this falls 1.6% short of the KPI target, it represents a 15.1% improvement compared to last year (2022-2023). With the upcoming refit of our Cheltenham HQ, we expect to achieve this target in the coming year.	
	Improve annual staff turnover: Actively work towards ensuring our annual staff turnover remains below the UK average (34% in 2024).	In 2023-2024, Commercial's annual turnover rate was 29.5%, remaining below the UK national average.	

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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.	During the reporting period, there were 68 new starters, all of whom received health and safety induction training covering risk assessments, PPE, and basic manual handling. An additional 58 Health and Safety certificates were obtained by other members of staff. Training at Commercial extends beyond health and safety; the company is committed to providing all employees with opportunities to enhance their skills and advance their careers. As a result, a total of £78,707 was spent on training and certifications throughout the reporting year.	
	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	Commercial's partnership with Help@Hand remains in place and is communicated to all employees through posters displayed around the workplace, as well as information being easily accessible through BambooHR and our Culture Code (employee handbook). All new starters are introduced to the counselling service during their company induction. Additionally, Commercial hosts learning days and sends company-wide emails focused on mental health throughout each reporting period.	
Mental Health Support	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	Commercial continues to exceed this key performance indicator by maintaining a total of seven trained Mental Health First Aiders. All employees can access Mental Health First Aider information on our digital Health and Safety Noticeboard.	
	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.	Commercial's Volunteer Day initiative was not utilised by 50% of employees. However, the total volunteering hours increased by 45. Thus, moving forward, Commercial will continue working to enhance employee awareness and participation in the initiative.	
Work-Life Balance Support			
Modern Slavery	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.	All new starters who joined Commercial during the 2023-2024 financial period were required to provide proof of their Right to Work in the UK, and all successfully fulfilled this requirement.	
	DBS Checks: Continue to ensure that 100% of successful candidates entering job roles requiring DBS checks complete the process. This practice enables Commercial to make safe and informed recruitment decisions, supporting the safety and welfare of all employees. Compliance will be tracked through the recording of DBS checks and documentation obtained from each applicable individual.	All new starters entering job roles requiring a DBS check during the 2023-2024 period successfully completed this requirement, achieving a 100% compliance rate.	

Key Performance Indicators: Progressing Forward

At Commercial, we take pride in holding ourselves accountable and continuously striving to be the best business we can be. For the 2024-2025 reporting period, and beyond, we have set the following KPIs to maintain and build upon the progress made above:

Accident and Incident Report Log:

With Commercial's most recent reporting year (2023-2024) having two logged accidents and incidents, it is our target to ensure the correct measures are in place to prevent accidents occurring year-on-year. To ensure this target is met, the following actions will be implemented:

- **Maintain ISO 45001 Certification:** Continual compliance with ISO 45001 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 every 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 monthly catchups with their line manager on their wellbeing and health and safety protocols, specific to their field of work.

Working Conditions and 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. Therefore, Commercial will continue to work towards the following targets:

Working Environment and 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 will 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:** While being a natural by-product of the above target, we will also work actively to ensuring our annual staff turnover remains below the UK average (34% in 2024¹).

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.

² UK Annual National Average Turnover: CIPD, 2024

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. 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:** Continue to ensure that 100% of successful candidates entering job roles requiring DBS checks complete the process. This practice enables Commercial to make safe and informed recruitment decisions, supporting the safety and welfare of all employees. Compliance will be tracked through the recording of DBS checks and documentation obtained from each applicable individual.

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

Signed: Arthur Hindmarch (Chairman)

A handwritten signature in black ink that reads 'Arthur Hindmarch'.

Date: November 2024