

# Partnership.

- ✓ Provide carbon reporting on individual jobs for managed service clients.
- ✓ Reduce carbon emissions via improved route optimisation techniques.
- ✓ Provide carbon off-setting options for clients.
- ✓ Provide a returns management process to help cleanse client databases and hence reduce waste.



**Over 80m data records cleansed per annum helping clients reduce unwanted mail and ensuring mail arrives at the correct address.**



**100% of secured waste recycled, saving over 1.7T of CO2 in a 12-month period.**

**Over 95% of Non-Secure waste from TDG warehouses recycled via trusted waste processors.**



# Performance.

- ✓ Investment in new energy-efficient hubs.
- ✓ LED energy-saving lighting with motion sensors deployed at all our key sites.
- ✓ Deploy double-decker trailers to increase capacity and reduce the number of routes operated each day.
- ✓ Improved consumable management processes deployed to reduce dedicated consumable deliveries.
- ✓ Electric vehicles employed in Central London with ambition to convert all vehicles to Electric within 10 years.



**Automation of pallet wrapping introduced to reduce plastic used in our warehouses (66% reduction in plastic).**



**All delivery vehicles (light fleet) operating in London replaced with electric vehicles saving approximately 51,000 kg of CO2 per annum.**



# People.

- ✓ Hybrid home working policy introduced for all eligible staff, reducing CO2 travel to work emissions by approximately 30,800kg.
- ✓ Cycle to work scheme to help reduce CO2 emissions.
- ✓ Accredited to ISO14001, which promotes good practice for environmental processes.
- ✓ Environmental training and awareness.
- ✓ Free to use staff charging points for EVs.



**Telematics installed on all vehicles to improve driver performance and reduce CO2 emissions.**



**Environmental awareness training completed by all staff.**



# Ethical Policy

## 1. Purpose

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- 1.1. The Delivery Group (“the Company”) is committed to the practice of responsible corporate behaviour.
- 1.2. Through its business practices, the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- 1.3. Furthermore, the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company.
- 1.4. The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.
- 1.5. This policy is non-exhaustive, and all aspects of the Company’s business should be considered in the spirit of this policy.

## 2. Human Rights

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- 2.1. The Company is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.
- 2.2. The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
- 2.3. The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breaches the human rights of those affected by the organisation’s activities.

## 3. Workers’ Rights

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- 3.1. The Company is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.
- 3.2. No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.
- 3.3. No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
- 3.4. Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular, workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.
- 3.5. The Company does not accept any corporal punishment, harassment in any form, or bullying in any form.

## 4. Environmental Issues

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- 4.1. The Company is committed to keeping the environmental impact of its activities to a minimum. As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating. This is further detailed within the Environmental Policy.

## 5. Conflicts of Interest

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- 5.1. The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.
- 5.2. In order to help preserve and strengthen these relationships, the Company has developed a policy which complies with the anti-bribery legislation and provides rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption. Copies of the anti-bribery Policy are available from HR.
- 5.3. All officers, employees and representatives of the Company are expected to act honestly and within the law.



## 6. Information and Confidentiality

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- 6.1. Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
- 6.2. The Company will at all times ensure that it complies with all applicable requirements of data protection legislation (including, but not limited to the GDPR policy 2018) in force from time to time.

## 7. Shareholders and Investors

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- 7.1. The Company, its officers, employees and representatives are committed to ensuring that no act or omission which is within their power and which would have the effect of deliberately, negligently or recklessly misleading the shareholders, creditors or other investors in the Company occurs.

## 8. Suppliers and Partners

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- 8.1. The Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- 8.2. The Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.
- 8.3. The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

## 9. Bribery and Corruption

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- 9.1. The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.
- 9.2. Employees and any other persons associated with the Company, such as agents, subsidiaries and business partners, are not permitted to either offer or receive any type of bribe and/or facilitation payment.
- 9.3. All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy available from HR.
- 9.4. Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality, they must refer to the Gift and Hospitality Policy available from HR.
- 9.5. The Company uses its reasonable endeavours to implement the guiding principles on bribery management that are published, from time to time, by the Secretary of State in accordance with Section 9 of the Bribery Act 2010.
- 9.6. If an employee or associated person is found guilty of giving or receiving a bribe, they will be personally criminally liable and may be subject to disciplinary action.
- 9.7. Anyone found guilty of bribery will be responsible for bearing any related remedial costs such as losses, court fees or expenses.



# Environmental and sustainability policy v2-1

## Our Commitment to Sustainability

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The Delivery Group recognises that it is vital to drive improvements in the business's environmental performance and has developed this policy to demonstrate the commitment to the environment in which we operate.

We are committed to sustainable development (meeting the needs of the present without compromising the ability of future generations to meet their own needs) as a guiding principle within our business. Concern and care for the environment is an integral and fundamental part of this commitment.

We aim to reduce the impact on the environment from our operational activities.

The Company aims to meet its commitment to sustainability through the way in which it provides services to its clients. Directors, Managers and Staff will collectively take responsibility for this policy and all parties are committed to its success. A list of key targets is shown in Appendix 1 (this is subject to future technological developments and availability of equipment supply).

## Our Environmental/Sustainability action plan

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In our role as a provider of both national and International mail and parcel services, we aim to promote good governance with both clients and suppliers.

### We will endeavour to:

- Encourage employees and contractors to incorporate informed sustainability perspectives within their work.
- Operate in ways that balance social and economic impact and minimise adverse effects on the local community.
- Develop sustainable procurement procedures within all elements of the supply chain.
- Encourage repair, reuse and recycling ahead of the responsible disposal of surplus materials and minimise waste generation.
- Maximise the efficient use of energy and materials.
- Increase the use of renewable energy sources.
- Take positive actions promoting continual improvement in sustainability performance.
- Develop the capacity of staff to promote the principles and practice of sustainability.
- Encourage other partners to adopt sustainable best practices.

### Our current initiatives include:

- Accredited to ISO14001, which promotes best practice for environmental processes.
- Ability to provide estimated carbon reporting on individual jobs for clients.
- Provide a returns management process to help cleanse client databases and reduce waste.
- 100% of secured waste is recycled, and 95% of non-secure waste is recycled.
- LED lighting installed across all sites with communal lighting using motion-sensors to reduce energy use.
- Electric Vehicles in London for collections and deliveries.
- Increased awareness of our suppliers and how we can work to achieve recyclable and recycled products.
- Reduced heating requirements for our warehouses compared to others in the sector.
- Investment in two new energy-efficient hubs.
- Solar panel installation at our head office building which helps to reduce our carbon footprint.
- Double-decker trailers to increase capacity and reduce the number of routes and reduce our carbon footprint.
- Improved consumable management process deployed to reduce dedicated consumable deliveries.
- Hybrid working scheme deployed to reduce travel to work, reducing emissions by over 15000 kg of CO2.
- Free-to-use charging points installed at key sites.



**Our future plans include:**

- Working with Royal Mail to help reduce the carbon footprint of mailings by improved containerisation and changes to the existing services.
- Replacing our HGV fleet with electric vehicles once technology is fully established with a proven record of reliability and appropriate operational mileage range (likely to be second-generation electric HGV vehicles) by 2040.
- Exploring the use of LNG HGV vehicles as an interim step in reducing our emissions in the short term.
- To install additional electric chargers at all sites to fully meet the demands of private car users and visiting clients/ suppliers by 2030.
- Procure all electricity from carbon-neutral sources by 2032.
- Encourage private vehicles to be used by employees for business miles are fully electric or hybrid petrol by 2028 (incentivise staff via increased mileage rates).
- To achieve Carbon Net Zero including our supply chain by 2045.
- Investigate producing solar-powered electricity at other key sites via the use of roof-installed solar panels.

Climate change and its relationship to man-made carbon emissions are significant global issues. TDG recognises the importance of understanding and improving the environmental impact of mail and parcels and is committed to making the above changes. However, TDG also acknowledges that some of these changes require additional time or technological advances not within the control of TDG, and therefore, as an interim measure, TDG will contribute to its Carbon Net Zero aims by offsetting its Scope 1 and Scope 2 carbon emissions each year through the accredited Carbon Neutral Britain (certified to the highest standards through the UK and EU Emissions Trading Standard (EU + UK ETS), Gold Standard Voluntary Emission Reductions (VERs) and the United Nations Certified Emission Reductions (CERs) programmes).

**TDG Key Targets Appendix 1**

Objective	Target Date
To achieve Carbon net Zero for direct operational activity	2045
Start monitoring of Scope 3 emissions	Sept 2022
Offset all Scope 1 and 2 emissions until cleaner technologies are available	Aug 2022
Operate an electric HGV fleet ceasing the use of fossil fuel vehicles	2040
Reduce CO2 emissions by 50% (Scope 1 and 2)**	2030
Ensure all our grey fleet is either hybrid petrol or electric	2028
Ensure that all the grey fleet is fully electric	2030
Replace current gas-powered heating boilers with heat pumps at all sites	2028
Ensure all energy used is from renewable sources	2035

\*\* Subject to available technology from manufacturers

Signature of Director:



Name of Director:

**Michael Owen**

Position:

**Group CEO**

Date:

**1st May 2022**



# Carbon Reduction Plan

**Supplier name:** The Delivery Group

**Publication date:** January 2022

## Commitment to achieving Net Zero

The Delivery Group is committed to achieving Net Zero emissions by 2045.

## Baseline Emissions Footprint

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 2019–2020	
<b>Additional Details relating to the Baseline Emissions calculations.</b>	There is no previous reporting and creation of a new baseline due to substantial Group organisational change.
Baseline year emissions:	

Emissions	TOTAL (tCO <sub>2</sub> e)
Scope 1	
Natural Gas	60.15
Vehicle Fleet	6993.77
<b>SUB-TOTAL</b>	<b>6943.92</b>

Scope 2	
Electricity	174.16
<b>SUB-TOTAL</b>	<b>174.16</b>

Scope 3	
Grey Fleet	39.44
<b>SUB-TOTAL</b>	<b>39.44</b>

<b>TOTAL EMISSIONS</b>	<b>7157.53</b>
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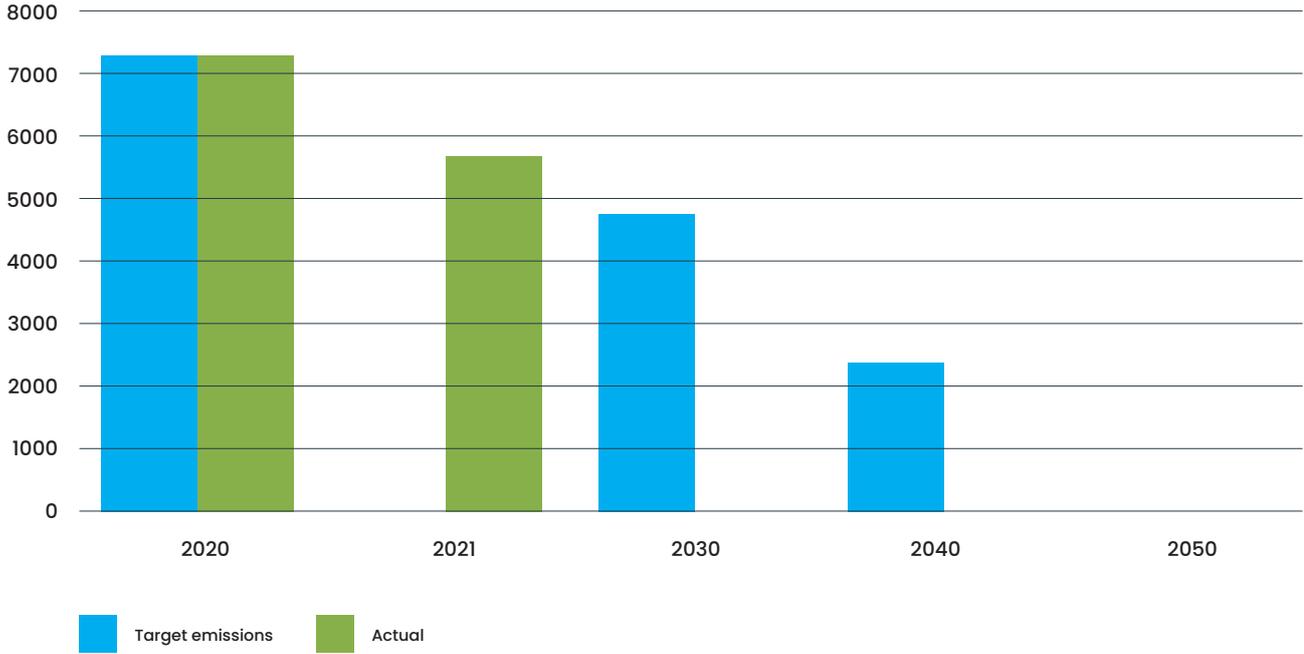


### Emissions reduction targets

To continue our progress to achieving Net Zero, we have adopted the following carbon reduction targets.

We project that carbon emissions will decrease over the next five years to 4280.17 tCO<sub>2</sub>e by 202, a reduction of 25% Progress against these targets can be seen in the graph below:

### Carbon Reduction: Projected vs Actual



## Carbon Reduction Projects

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### Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2019-20 baseline. The carbon emission reduction achieved by these schemes equates to 1450.63 tCO<sub>2</sub>e, a 20.26% reduction against the 2019-2020 baseline and the measures will be in effect when performing the contract.

This includes environmental management measures we have in place, such as certification to ISO14001 across the group. We have adopted LED/PIR lighting controls in all communal areas to ensure efficient use of lighting.

All HGV vehicles are Euro 6, and electric vans used throughout London. We are looking into the possibility of compressed gas and electric options for the HGVs on renewal through our five-year fleet renewal plan.

Where possible, we have solar panels on the roof of our warehouse.

The Delivery Group is striving to procure all electricity from Carbon Neutral, Renewable or sustainable sources by 2050 and looks to get supplies from Carbon Neutral sources within 15 years.

There is a policy to promote private vehicles used for business to be electric within 15 years.

We want to remove single-use plastic shrink wrap and replace it with an environmentally friendly alternative within 10 years on all sites.

We are looking to audit all key suppliers by 2040 to ensure carbon neutrality.

We will replace heating and hot water sources with Air pump heat exchangers on renewal within 10 years.

TDG encourages all staff to commute to and from the workplaces with net neutral sources of transportation. TDG has also introduced hybrid working and therefore reduced the commute to and from the workplace.

### Declaration and Sign Off

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This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standards for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard and uses the appropriate government emission conversion factors for greenhouse gas company reporting<sup>2</sup>.

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard<sup>3</sup>.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed on behalf of the Supplier:

Name:

Position:

Date:

<sup>1</sup> <https://ghgprotocol.org/corporate-standard>

<sup>2</sup> <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

<sup>3</sup> <https://ghgprotocol.org/standards/scope-3-standard>



# Quality Assurance Policy

The Delivery Group (TDG) aims to be the number one advisor and implementer of postal and logistics solutions in the UK market through constant update of software, analytical skills and partnerships. TDG's accurate and efficient delivery of our solutions is key to us being recognised as the main solutions supplier, standing us apart from our competitors.

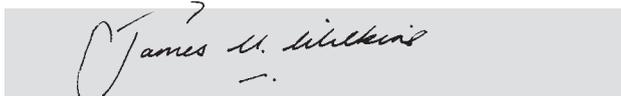
To support our commitment to our customers, we will operate, maintain and continuously improve our service. To achieve this, we have adopted ISO 9001:2015, a formal and industry-recognised management system and are committed to improving its effectiveness. We continually review our implemented systems and procedures and recommend changes and alternative solutions to our Senior Management Team. TDG's continuous improvements are driven by the needs of our customers and the ongoing support and feedback from our suppliers.

All employees are aware of our Quality Policy and that the procedures within the management system are mandatory. The Operations Manual forms part of the day-to-day responsibility of employees and allows them to participate in discussions with the Senior Management Team to improve levels of service, quality and efficiency.

We have established top-level objectives in order to monitor and measure the efficiency of our company. The basis of our system is to give our customers confidence that there is a structured approach to the delivery of our products and services.

This Policy is reviewed annually within our Management Processes.

Signature of Director:



Name of Director:

**James Wilkins**

Position:

**Group Operations and IT Director**

Date:

**21st September 2021 - Revision A**



# Modern Slavery and Human Trafficking Statement

## Introduction

The Delivery Group is committed to acting ethically and with integrity, and ensuring that modern slavery and human trafficking are not taking place in our business or supply chains. This Modern Slavery and Human Trafficking Statement is published in accordance with the Modern Slavery Act 2015 and sets out the steps that we have put in place and continue to develop, in order to tackle the risk of modern slavery and human trafficking within our Group and supply chains.

## Company Structure

At The Delivery Group, we specialise in international and domestic eCommerce and mail distribution services, delivering over a billion items a year. We operate from five major locations in the UK and employ over 500 staff.

This statement applies to all members of The Delivery Group, and for the purpose of this statement, we will use the terms 'we', 'our' and 'Group' to include the following companies: Secured Express Limited t/a The Delivery Group, CMS Network (London) Limited t/a The Delivery Group, Postal Choices Limited t/a OnePost ETrak Logistics Limited.

## Policies in relation to Slavery and Human Trafficking

We all have a duty to be alert to risks, however small they may seem. As such, our policies set out our expectations and commitments to our people, suppliers and clients. Our policies are readily available to our employees, and those not published on our website are available to customers and suppliers upon request. Relevant policies for modern slavery and human trafficking include:

- Corporate Social Responsibility (CSR) policy – Our CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.
- Whistleblowing policy – We encourage all our staff, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form.
- Employee code of conduct – Our employee code of conduct, contained in employee handbooks, makes clear to employees the actions and behaviour expected of them when representing the Group. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- Supplier/Procurement code of conduct – We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions where they do not meet the standard. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- Recruitment policy – We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency. We regularly audit employment agencies we use to ensure that all the right to work and identity checks are being carried out.
- Anti-Bribery and Corruption policy – We are committed to the practice of responsible corporate behaviour and as such our policy sets out the standards of behaviour we expect to ensure the integrity of the supply chain.

## Due Diligence

As part of the supply chain, we undertake due diligence to ensure we are not entering into a contract or service that could be misconstrued, and demand of our suppliers the highest credentials. This also includes any agencies that supply our companies with temporary labour.

The following activities are considered to be at high risk of modern slavery or human trafficking:

- Employment of foreign nationals who are not permitted to work in the UK and vehicles or those of our suppliers crossing UK borders



To mitigate these risks, we undertake thorough company checks and satisfy ourselves with the viability of any companies we do business with. We would also take account of any Foreign Office advice relating to countries we provide services to.

Education is key to the understanding and upholding of our policies, and as part of our management toolkits, we actively ask all management and our employees to raise concerns if they believe any aspect of our supply chain is compromised by human trafficking or slavery.

The Delivery Group undertakes rigorous internal verification of employees with interviews, work histories, CRB checks, right-to-work checking and professional screening to reduce the risk of employing a person that is not registered or allowed to work in the constituent supply chain. These policies must also be able to be audited with all our temporary labour suppliers (Agencies), ensuring against legislative compliance breaches.

Directors of the Group are committed to ensuring that there isn't any modern slavery or human trafficking in our supply chains by auditing and choosing world brand leaders in delivery. Our Modern Slavery policy reflects our commitment to act ethically and with the utmost integrity within all our business relationships. We work to ensure our suppliers adhere to our policies and, when correct to do so, back-to-back our employment criteria to ensure best-in-class systems and controls are used. With the issuance of strict moral codes and practices to our partners, we regularly carry out audits through our internal and HR departments, assisting in driving out all aspects of human trafficking and slavery from our supply chains.

Responsibility for our anti-slavery initiatives is as follows:

- **Policies** Human Resources in each business unit are responsible for creating and reviewing policies. The process by which policies are developed is to review best practices and legislation and adapt policy to the needs of the organisation.
- **Risk assessments** The Compliance Manager and Health & Safety and Process Manager is responsible for risk assessments in respect of human rights and modern slavery by process of planned review, audit and control activities.
- **Due diligence** Human Resources and Finance departments, along with the Compliance Manager and Health & Safety and Process Manager are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

## Training

Our staff are required to undertake various online training programmes both at induction and then refresher training annually. This training is used in conjunction with our company policies to ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains. All staff have easy access to and are required to read, sign and adhere to the company policies that are in place across the Group.

## Performance indicators

The Group uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains: The use of labour monitoring and payroll systems; Outcomes of employment agency auditing process; Annual risk assessment data; Number of complaints raised.

The Board of Directors believes that by driving the correct internal and supplier behaviours, slavery in any form will be removed from the supply chain. It is a basic prerequisite that we remove any instance across our supply chain, and therefore we will continue to strive to ensure that all companies across the Group keep modern slavery risks at the forefront of their processes. Accordingly, this statement is approved by the Board of Directors at this time and will be reviewed annually or indeed when a change of legislation means it is relevant and proper to do so.

Signature of Director:



Name of Director:

**Michael Owen**

Position:

**Group CEO**

Date:

**1st May 2022**



# Anti-Bribery Policy

## 1. Purpose

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- 1.1. The Delivery Group (“the Company”) is committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.
- 1.2. The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 (“the Act”) and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

## 2. Bribery

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- 2.1. Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.
- 2.2. Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.
- 2.3. Bribery of a foreign official is defined as the giving or promising of a financial or other advantage which is intended to influence the official in order to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

## 3. Consequences of Bribery

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- 3.1. Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.
- 3.2. For employees of the Company, failure to comply with this Policy and/or with the Act may result in:
  - 3.2.1. disciplinary action which may include dismissal; and
  - 3.2.2. criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.
- 3.3. For the Company, any breach of this Policy by any employee or business associate may result in:
  - 3.3.1. the Company being deemed to be in breach of the Act;
  - 3.3.2. the Company being subject to fines; and
  - 3.3.3. the Company suffering negative publicity and further associated damage as a result of such breach.

## 4. Responsibility for Compliance and Scope of Policy

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- 4.1. This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including individuals, partnerships and corporate bodies) associated with the Company or any of its subsidiaries.
- 4.2. It is the responsibility of all of the above mentioned parties to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the Company’s Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.
- 4.3. No party described in section 4.1 may:
  - 4.3.1. give or promise any financial or other advantage to another party (or use a third party to do the same) on the Company’s behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct;
  - 4.3.2. request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.



#### 4.4. Parties described in section 4.1 must:

- 4.4.1. be aware and alert at all times of all bribery risks as described in this Policy and in particular as set out in section 9 below;
- 4.4.2. exercise due diligence at all times when dealing with third parties on behalf of the Company; and
- 4.4.3. report any and all concerns relating to bribery to the appropriate Line Manager or Human Resources Department or, in the case of non-employees, their normal point of contact within the Company, or otherwise in accordance with the Company's Whistleblowing Policy.

## 5. Facilitation Payments

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- 5.1. A facilitation payment is defined as a small payment made to officials in order to ensure or speed up the performance of routine or necessary functions.
- 5.2. Facilitation payments constitute bribes and, subject to section 5.3, may not be made at any time irrespective of prevailing business customs in certain territories.
- 5.3. Facilitation or similar payments may be made in limited circumstances where your life is in danger but under no other circumstances. Any payment so made must be reported to the appropriate Line Manager or the Human Resources Department as soon as is reasonably possible and practicable.

## 6. Gifts and Hospitality

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- 6.1. Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Company's Gifts and Hospitality Policy. The Delivery Group Ltd. Anti-Bribery Policy. Version 4. Reviewed October 2020 Next Review October 2021
- 6.2. 6.2. Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.
- 6.3. 6.3. The following general principles apply:
  - 6.3.1. Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
  - 6.3.2. Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
  - 6.3.3. Cash should be neither given nor received as a gift under any circumstances.
  - 6.3.4. Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
  - 6.3.5. The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
  - 6.3.6. Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy may be accepted if refusal would cause significant and/or cultural offence, however, the Company will donate any gifts accepted for such reasons to a charity of their choosing.
  - 6.3.7. All gifts and hospitality, whether given or received, must be recorded in the Hospitality & Gifts Register. Anything with a value in excess of £5 or which contains alcohol should be surrendered to the Human Resources Department for assessment.

## 7. Charitable Donations

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- 7.1. Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.
- 7.2. Proof of receipt of all charitable donations must be obtained from the recipient organisation.
- 7.3. Under no circumstances may charitable donations be made in cash.
- 7.4. No charitable donation may be made at the request of any party where that donation may result in improper conduct.



## 8. Political Donations

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- 8.1. The Company does not make political donations, and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.
- 8.2. Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

## 9. Due Diligence and Risks

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The following issues should be considered with care in any and all transactions, dealings with officials, and other business matters concerning third parties:

- 9.1. Territorial risks, particularly the prevalence of bribery and corruption in a particular country;
- 9.2. Cross-border payments, particularly those involving territories falling under section 9.1;
- 9.3. Requests for cash payment, payment through intermediaries or other unusual methods of payment;
- 9.4. Activities requiring the Company and/or any associated party to obtain permits or other forms of official authorisation;
- 9.5. Transactions involving the import or export of goods;

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Signature of Director:



Name of Director:

**Michael Owen**

Position:

**Group CEO**

Date:

**23rd October 2020**



# Business Continuity & Disaster Recovery Plan

<b>Warrington Head Office Site</b>	Unit 2 Catalina Approach, Omega South Warrington WA5 3UY
<b>Luton Site</b>	Unit 32 North Luton Industrial Estate Sedgwick Road Luton LU4 9DT
<b>Bristol Site</b>	Horizon 38 Unit 8 Bolingbroke Way Bristol BS34 6FE
<b>Kent Site</b>	Unit F2 Sheldon Way Larkfield Aylesford Kent ME20 6SE
<b>London Site</b>	Unit 32 North Luton Industrial Estate Sedgwick Road Luton LU4 9DT
<b>Charlton Site</b>	Unit 1 – Bungalow V I P Industrial Estate Anchor and Hope Lane Charlton London SE7 7TE
<b>Document Version</b>	7
<b>Distribution</b>	
<b>E-mails</b>	TDG SMT; Neil Fleming-Smith; Neil Smith; Phil Dawson
<b>Hard Copy</b>	Bound copy provided to all SMT members for offsite storage



**Strictly Confidential**

This document is not to be distributed to unauthorised personnel



## 1. Document Control

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### a. DOCUMENT AUTHORITY

Updated by:

**Gill Jupp**

Date:

**8th August 2022**

Reviewed by:

**James Wilkins**

Date:

**15th August 2022**

Approved by:

**Michael Owen**

Date:

**16th August 2022**

## 2. Description

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The Disaster Recovery Plan has been written for The Delivery Group and incorporates all the trading entities (Secured Express Limited, CMS Network (London) Limited and Postal Choices Limited) that operate under the Delivery Group trading banner. The ultimate parent company is TDG 2021 Holdco Limited and this plan covers all legal entities within the parent company structure.

## 3. Aim of the Plan

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This plan has been designed to document The Delivery Group's processes to be followed in the unlikely event of an emergency or crisis. It is intended that this document will provide the basis for a relatively quick and smooth return to "business as usual", regardless of the cause.

## 4. Objectives of the Plan

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- Understand the critical functions and activities of the organisation
- Analyse and respond to the risks to the organisation
- Provide a detailed prioritised and timetabled response to an emergency situation
- Identify the key roles, responsibilities and contacts to respond to an emergency Critical Events Analysis and Recovery



## 5. Critical Events Analysis and Recovery

- TDG has assessed the impact of a range of events on its business operations and the impact of such events on customers, staff and suppliers. TDG has identified actions that would need to be taken in respect of minimising the impact on its operations, customers and staff and these are summarised below:

Area impacted	Measures to be taken / mitigations in place	Max. estimated recovery time
Loss of TDG site	Three of TDG's sites are automated for bulk mail services, and due to this automation, all sites have non-working hours capacity which can be utilised by the affected site. For example, work sorted in Warrington can be diverted to Luton or Bristol for processing. This arrangement can be put in place until the impacted site is back operational.	Work can be diverted to an alternative site within 6 hours and thus maximum delay to customers is plus 1 day
	Unsorted mail is processed within Maidstone and Warrington and therefore, as above, work can be diverted if one of these sites is impacted. Additional hand-sort frames are available at all sites if needed.	As above
	Ecommerce sortation is carried out in Luton, but the Bulk Mail automation in Luton, Warrington and Bristol has also been configured to sort for E-commerce.	No processing delays
	Pallet services are carried out in Charlton. This work can be moved to Kent in the short term whilst temporary facilities are located.	Delay in service up to 24 hrs
	London hand delivery services are carried out in Bermondsey. This work can be moved to Kent.	Some first class mail services may be impacted but alternative services could be used to avoid delays
	All admin and support staff use hybrid working and therefore all non-operational staff are equipped to work from home. Staff may also travel and work from alternative sites.	No delays in service as a result
Loss of infrastructure	A major loss of IT, power or utilities meaning that a hub is non operable – see above ("loss of TDG site")	See above
	Major loss of TDG fleet – TDG's fleet of vehicles is spread across all 6 locations, and therefore, any loss of fleet is likely to be isolated to an individual location and vehicles can be re-allocated. TDG has accounts with hire vehicle suppliers and is able to increase the fleet size significantly at short notice.	Delay in service up to 24 hrs to relocate vehicles. Delays up to 48 hrs to increase hire fleet in excess of normal levels
Information / data loss	All of TDG's servers are mirrored and therefore a failed server can be taken down and replaced with a mirrored server.	Up to 2hrs delay
	Loss of historical data is mitigated by TDG's backup process	Up to 2hrs to restore backups
Loss of critical staff	All critical staff have a nominated deputy who covers for them when away from the business.	No delays / impac

## 6. Command and Control

The decision to implement this plan following a live event will be taken by the Group CEO, the Group COO or the Group Chairman. In the unlikely event that any of the above positions are not able to carry out the instruction to launch this plan, then the TDG Board will immediately appoint a representative to do so.



## 7. Emergency Response Checklist

This page should be used as a checklist during any event that triggers the use of this plan.

Task	Completed (Date / Time / By)
Start a log of actions and expenses undertaken (see section Action and Expenses Log)	
Liaise with emergency services if required	
Identify and quantify any damage to the organisation, including staff, premises, equipment, data, records, etc.	
Identify which critical functions have been disrupted	
Convene those responsible for recovering identified critical functions, and decide upon the actions to be taken, and in what timeframes (use section 5 Critical Events Analysis and Recovery Process)	
Provide regular information updates to: <ol style="list-style-type: none"> <li>1. TDG Board</li> <li>2. Staff</li> <li>3. Suppliers and customers</li> <li>4. Insurance company</li> </ol>	

## 8. Contact List – Key First Line Personnel

Name	Title	Contact Details
James Wilkins	Group COO	M: 07740 582 313 E: james.wilkins@thedeliverygroup.co.uk
Michael Owen	Group CEO	M: 07584 315 356 E: michael.owen@thedeliverygroup.co.uk
Steve Stokes	Group Chairman	M: 07825 505 987 E: Steve.stokes@thedeliverygroup.co.uk
Martin Johnson	Group Operations Director	M: 07980 894 060 E: Martin.johnson@thedeliverygroup.co.uk
Lauren Metaal	Group Sales Director	M: 07823 526 512 E: Mark.plant@thedeliverygroup.co.uk
Mark Plant	Group Data and Compliance	M: 07584 315 356 E: michael.owen@thedeliverygroup.co.uk
Meurig Evans	Group CFO	M: 07843 369 360 E: Meurig.evans@thedeliverygroup.co.uk
Claire Rooks-Byron	Group HR	M: 07984 498 939 E: Claire.rooks-byron@thedeliverygroup.co.uk
Mark Calladine	Group Ecommerce & International	M: 07970 563 513 E: Mark.calladine@thedeliverygroup.co.uk



### 9. Contact List – Key Suppliers

THIS SECTION IS REDACTED

### 10. Contact List – Strategic Customers

A list of customer contacts is available within the Group’s online CRM system (Salesforce.com) and all contract information for each customer is available.

### 11. Key Information for each TDG site

David Chapman – Group Facilities Manager, holds all key contact information for each site. This information is held offsite. Each hub manager will also hold information for their hubs, and finance can also access key hub supplier details through the Sage Accounting system.

### 12. Actions & Expenses Log

This form should be used to record decisions, actions and expenses incurred in the recovery process. This will provide information for the post-recovery debriefing, and help to provide evidence of costs incurred for any claim under an insurance policy.

Date / Time	Decision / Action Taken	By Whom	Cost Incurred



# Certificate of Registration

This is to certify that the Management System of:

**The Delivery Group**

**Unit G8, Bolingbroke Way, Patchway, Bristol, BS34 6FE**

**And as detailed on the Annex to this certificate**

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 27001: 2013



<b>Certificate Number:</b>	<b>7537-ISMS-001</b>
Initial Registration Date:	24/09/2009
Previous Expiry Date:	10/02/2021
Recertification Audit Date:	01/12/2020
Re-issue Date:	13/04/2022
Current Expiry Date:	10/02/2024

## Scope of Registration:

The security of data and information related to and used in conjunction with the provision of a postal management system to the direct marketing industry carried out at Portishead and Raynesway, in accordance with the Statement of Applicability v13.

Signed:  
Alyn Franklin, Chief Executive Officer  
(on behalf of Alcumus ISOQAR)



This certificate will remain current subject to the company maintaining its system to the required standard. This will be monitored regularly by Alcumus ISOQAR. Further clarification regarding the scope of this certificate and the applicability of the relevant standards' requirement may be obtained by consulting Alcumus ISOQAR

**Alcumus ISOQAR Limited**, Cobra Court, 1 Blackmore Road, Stretford, Manchester M32 0QY.

**T:** 0161 865 3699 **E:** isoqarenquiries@alcumus.com **W:** alcumus.com/isoqar

This certificate is the property of Alcumus ISOQAR and must be returned on request.

# Certificate of Registration

This is to certify that the Management System of:

**The Delivery Group**

**Unit G8, Bolingbroke Way, Patchway, Bristol, BS34 6FE**

**And as detailed on the Annex to this certificate**

has been approved by Alcumus ISOQAR and is compliant with the requirements of:

ISO 14001: 2015



<b>Certificate Number:</b>	<b>7537-EMS-001</b>
Initial Registration Date:	19/12/2012
Previous Expiry Date:	10/02/2021
Recertification Audit Date:	01/12/2020
Re-issue Date:	13/04/2022
Current Expiry Date:	10/02/2024

## Scope of Registration:

The provision of Postal Management Services.

Signed:  
Alyn Franklin, Chief Executive Officer  
(on behalf of Alcumus ISOQAR)



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ISO 9001: 2015



<b>Certificate Number:</b>	<b>7537-QMS-001</b>
Initial Registration Date:	19/12/2012
Previous Expiry Date:	10/02/2021
Recertification Audit Date:	01/12/2020
Re-issue Date:	13/04/2022
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This certificate is the property of Alcumus ISOQAR and must be returned on request.

Carbon  
Neutral  
Britain™



*Rtweedy*

**REBECCA TWEEDY**  
Credit Officer

*James Poynter*

**JAMES POYNTER**  
Director



United Nations  
Framework Convention on  
Climate Change  
Verified CER



Verified Carbon  
Standard  
A VERRA STANDARD



Gold Standard  
for the Global Goals



Certification is awarded based on accurate and assumed full disclosure of all relevant and necessary data by the Company. United Nations Credits issued via the Clean Development Mechanism (CDM). VCS is a certification standard for carbon projects and credits. VCS does not oversee retail markets nor does it certify or endorse any retailer or broker of VCU's visit [verra.org](http://verra.org). The Woodland Carbon Code logo is a registered trademark of the Forestry Commission. Gold Standard is a certification standard for carbon projects and a registered trademark.

Carbon Neutral Britain Certification™  
IS PRESENTED TO

**The Delivery Group  
Limited**

**Certified  
Carbon Neutral**

**AUGUST 2022 - JULY 2023**

This certificate is to verify that The Delivery Group Limited has met all Carbon Neutral Britain Certification™ standards in measuring, calculating and carbon offsetting organisational carbon emissions within the Scope 1, 2 and 3 (Grey Fleet) GHG emissions boundary during the period of 1st May 2020 to the 30th April 2021.

Certificate No: BCNB - 02389

Calculations made following the ISO 14064-1:2018 and GHG Protocol Emissions Standards.  
Credits Issued from one or more of the International Carbon Offsetting standards:

Carbon  
Neutral  
Britain™



*Rtweedy*

**REBECCA TWEEDY**  
Credit Officer

*James Poynter*

**JAMES POYNTER**  
Director



United Nations  
Framework Convention on  
Climate Change  
Verified CER



Verified Carbon  
Standard  
A VERRA STANDARD



Gold Standard  
for the Global Goals



United Nations Credits issued via the Clean Development Mechanism (CDM). VCS is a certification standard for carbon projects and credits. VCS does not oversee retail markets nor does it certify or endorse any retailer or broker of VCU's visit [verra.org](http://verra.org). The Woodland Carbon Code logo is a registered trademark of the Forestry Commission. Gold Standard is a certification standard for carbon projects and a registered trademark.

Certificate of Credit Retirement  
IS PRESENTED TO

**The Delivery Group  
Limited**

**5706.90 Tonnes CO<sub>2</sub>e  
Emissions Offset**

via the Climate Fund™ Portfolio of verified  
carbon offsetting projects around the world

Batch Serial #: 3559-251-2019771-VCS-VCU-590-VER-CER-0201987955310

**IN THE MONTH OF AUGUST 2022**

Certificate No: BCNB - 02389

Credits Issued from one or more of the International Carbon Offsetting standards: