

UN Global Compact Communication on Progress – Dulas Ltd

25th July 2022

To our stakeholders,

I am pleased to confirm that Dulas Ltd continues to support the ten principles of the Global Compact with respect to human rights, labour, environment and anti-corruption.

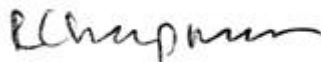
We are a Renewable Energy company providing products and services which deliver solutions to climate change impacts and to global healthcare challenges. Our solutions benefit both people and planet. This means the core purpose of our business embraces the three environmental principles. We design, implement and support renewable energy technologies both within the UK and in areas of the world with poor electrification, particularly for the use of primary healthcare, supporting routine childhood immunisation programmes and humanitarian aid programmes globally.

Labour rights are vital to our operations and values. We work both within the UK and Internationally. We are an employee owned and governed company, with equal shares for all, and with no external shareholders.

We are anti-corruption and our activities are undertaken through transparent bidding processes.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Yours Sincerely,



Ruth Chapman

Executive Managing Director, Dulas



Registered in Wales No. 1629011

Human Rights

- [Principle 1](#): *Businesses should support and respect the protection of internationally proclaimed human rights; and*
- [Principle 2](#): *make sure that they are not complicit in human rights abuses.*

Assessment, Policy & Goals

Dulas fully and passionately supports the Universal Declaration of Human Rights.

As a private limited company and employer we have a number of policies in place to support the declaration and in particular Article 23 and Article 25:

- ‘...to just and favourable conditions of work and to protection against unemployment’,
- ‘Everyone, without any discrimination, has the right to equal pay for equal work’,
- ‘Everyone who works has the right to just and favourable remuneration...’,
- ‘Everyone has the right to a standard of living adequate for the health and well-being of himself and his family...’

Our policies are outlined within our Employee Handbook, those relevant include:

- Pay and Reward Policy,
- Right to Request Flexible Working,
- Hybrid Working Policy (new for 2022),
- Relocation policy,
- Expenses Policy,
- Volunteering policy and paid time off for volunteering (new for 2022),
- Career Break Policy,
- Working Time & Annual Leave Policy,
- Equality & Diversity Policy,
- Paternity/Maternity Support Leave and Pay Policy ,
- Dignity at Work Policy,
- Recruitment & Selection Policy,
- Learning & Development Policy and Procedure,
- Modern Slavery and Human Trafficking,
- Anti-bribery and anti-corruption policy,
- Whistle Blowing Policy,
- COVID-19 Vaccination Policy,
- Compassionate Leave and Time off for Dependants Policy,
- Overseas Travel and Work Policy,
- Menopause Policy (new for 2022),
- Employee Wellbeing Policy.



We also have a number of employee benefits to support the well-being of our workforce including:

- Private healthcare,
- Income protection,
- Enhanced sick leave,
- Enhanced maternity and paternity provision,
- Death in service,
- Employee Recognition Scheme,
- Employee Assistance Programme.

Implementation

Our policies are implemented in our day to day operations. We adhere to the stringent UK and European recruitment and employment law and actively promote work-life balance through flexible family friendly working practices. We have in place an 'Employee Representative Group' that consults and supports all employees and puts in place well-being initiatives. During 2022 we have introduced a Hybrid Working Policy, allowing employees to work from home on a flexible basis. We have included a paid day off for voluntary work in the local community and introduced a Menopause Policy. Our Charity Group have donated profits to local charities and we have undertaken a corporate fundraising campaign for the global charity Renewable World.

Our work as a private limited company specifically supports Article 25 through the provision of our solar powered vaccine fridges and power systems for health care. These products enable improved health care and access to vaccinations in the most remote areas of the world. These products are World Health Organisation accredited and have become critical in helping to vaccinate the hardest to reach communities globally.

During 2018 we introduced policies on modern slavery and human trafficking. This was deemed essential as we are operating through agents and subcontractors in an increasing number of countries. These policies are regularly reviewed and updated.

During 2019 Dulas held a series of workshops with all employees to review and update our company values and working practices and principles. As a collective we agreed upon five values that we as employees all believe are integral to our company; i) Integrity, ii) Ethical, iii) Innovative, iv) Collaborative, v) Excellence. We have also asked all Members (employees) of the company to contribute to the review and update of our internal governance structure, meaning that they actively shaped the internal governance of Dulas. Our new governance structure was voted in by consensus in October 2020. Our Articles of Association set out that Members attend Quarterly Business Meetings and have the right to vote on key business decisions and the strategic direction of the company.

Measures of outcomes

Dulas undertakes regular stress surveys and consults with employees on a range of issues, which is fed back to departmental managers and the Board of Directors. The Employee Representative Personnel Group monitors and ensures that human rights are upheld. Throughout 2020-2022 we have consulted on working



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from home as a result of the pandemic and the on-going mitigations put in place to keep our employees safe.

A wider employee survey is undertaken annually to gauge employee responses to a number of questions about the working environment, team relationships, management and the Board. Anonymised results are circulated to the BoD and Senior Management Team.

Labour

- [Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- [Principle 4](#): the elimination of all forms of forced and compulsory labour;
- [Principle 5](#): the effective abolition of child labour; and
- [Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Assessment Policy and Goals

Dulas is a worker governed company. This brings unique commitment, equality and loyalty throughout our business. We encourage and support co-operation in Dulas as well as common ownership of business ideas and processes throughout teams.

The promotion of team working is paramount. We expect every employee to be self-motivated and responsible, and to participate in decision making in a considered manner. Management style is expected to be inclusive, supportive & coaching, we expect everyone with management responsibility to have excellent listening skills and a democratic approach but not to be afraid to deal with difficult issues & show leadership.

We take this approach as we believe this is the best for profit, people and the environment.

Dulas does not use forced or compulsory labour or use child labour.

Dulas adheres to UK and European laws regarding discrimination.

Implementation

Dulas has a culture of consultation and participation and all employee/Members will contribute to major business decisions. Dulas has been very pleased to retain our status as a fully worker governed company and we have a Member Advisory Committee which is responsible for advising the Board of Directors through consultation.

In June 2020 Dulas acquired the remaining 50% of its refrigerator manufacturing factory, Polestar, based in Bognor Regis, England. For the past five years we have been 50% Shareholders, but now fully own the company. This decision was taken through a Shareholder vote, in which all Members (employees) of Dulas got an equal vote on the purchase. We carried out detailed Due Diligence in advance including speaking to all employees at Polestar. Since the purchase we have worked with key employees at both Polestar and



Dulas to form the future strategy of the manufacturing business. This was signed off by all Members at our AGM in December 2020.

Dulas has a human resource team in place to ensure UK legislation is implemented and supported. A democratically elected personnel group is also in place which is responsible for employee probations, appraisals and are available to assist and support with any employee matters as and when they may arise.

Dulas values the health and safety of its employees and is now certified under the RoSPA Gold Award scheme as a safety-conscious employer. We have significant Health and Safety measures in place which we consult upon with our employees. In 2022 we have achieved a further accreditation; Safety in Procurement (SSIP).

Dulas works internationally through partners in countries such as Africa, India and South America. We implement contracts with our partners which uphold their rights under the Universal Declaration of Human Rights but also ensure they uphold these rights in the delivery of their work. All partners are asked to sign adherence to the UN Code of Conduct and to provide evidence in the delivery of their work.

Measures of outcomes

Standards and policies are monitored, updated and recorded by the employee representative Personnel Group; the supply chain is monitored by the ISO9001 process.

Environment

- [Principle 7](#): Businesses should support a precautionary approach to environmental challenges;
- [Principle 8](#): undertake initiatives to promote greater environmental responsibility; and
- [Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

Assessment Policy and Goals

Our core business is in the delivery of renewable energy solutions that make a positive impact on the environment through the provision of solar, wind, hydro and battery storage systems for commercial, humanitarian and public service applications around the world.

Our business is driven by the global targets for carbon reduction and the opportunity to deliver life-saving technologies to areas of poor electricity supply through the provision of renewable energy technologies.

Implementation

The Dulas headquarters are situated in extremely energy efficient BREEAM standard office buildings on a purpose built Eco business park in Mid-Wales. The area significantly benefits from the local employment opportunities presented by the business. The organisation's transport policies reflect our environmental goals and location next to a mainline railway station ensures that car journeys can be minimised.



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The whole business is dedicated to the installation and facilitation of wind farms, individual wind turbines, environmentally sensitive run-of-river hydro schemes, solar PV systems for businesses, battery storage projects and remote, off-grid applications.

We have recently installed an Electric Vehicle charger at the office which incorporates solar and battery power and host an EV charger for a community vehicle.

Dulas Environmental Management System Statement

Dulas achieved certification to ISO14001 in June 2015. The following Dulas Ltd documents are held in support of this:

- Environmental Policy Statement – this includes maintaining an Environmental Management System that conforms to ISO14001
- Environmental Management System model
- Environmental Management System Manual contents
- Management Review Procedure – this covers review of ISO14001:2004 sections 4.33, 4.4.1, 4.6
- Documents register showing relationship between ISO9001 and ISO14001 documentation
- Environment aspect chart
- Environment aspect register
- Legal Register
- Minutes of ISO14001 review meetings
- Waste monitoring
- Environmental Emergency Response and Pollution Prevention
- Waste management procedures

As a fully environmentally aware company we continued to manage, review and improve our environmental management through our ISO9001 and ISO14001 processes and as part of our Health & Safety management. We are continuing to improve our activities and there is support at director level and throughout the company.

Environmental awareness is embedded in Dulas Ltd as it is contained as an object in our Memorandum of Association:

“22.4 – to make a real contribution to improving peoples lives and the protection of the environment”.

At our HSQE Management Review Meeting in February 2022 commitment to our existing Environmental Objectives were agreed at Board and Senior Management level.

In September 2021 Dulas made a public declaration to start the journey to becoming Net Zero. Following feedback from Members, recognizing our Company Purpose and Values, and following a mandate by the Board of Directors, we joined the ‘United Nations Race to Zero Campaign’ (Race To Zero Campaign | UNFCCC). Through this scheme, which is both UN and UK gov driven, our commitment is as follows:

Recognising that climate change poses a threat to the economy, nature and society-at-large, our company commits to take action immediately in order to:



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1. Halve our greenhouse gas emissions before 2030
2. Achieve net zero emissions before 2050
3. Disclose our progress on a yearly basis

In doing so, we are proud to be recognised by the United Nations Race to Zero campaign, and join governments, businesses, cities, regions, and universities around the world that share the same mission.

Having made this public pledge we have since been working on establishing our baseline emissions and putting a plan in place to start reducing our impacts under scope 1 and scope 2. This has now been approved by the Dulas Board of Directors.

Anti-Corruption

- [Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.

Assessment Policy and Goals

Dulas is against corruption and supports the UN convention against corruption. In the updated values and working practices agreed upon by all employees in January 2020 one of the agreed values - 'Ethical' - is defined as: 'We passionately believe in people, in making a difference for our planet and its future, through sustainable, renewable and humanitarian business endeavours. We are committed to ISO 14001 environmental management which is reflected in our working practices, we strive for commercial sustainability and equality within an empowered work force.' In addition our 'Integrity' values is defined as: 'We value mutual honesty & truthfulness and behave with dignity, openness and consistency. Our trust & respect for each other is integral to our business. We excel in our fields with independence and accountable autonomy.' Both of these values support the anti-corruption principle.

Implementation

As an ethical business Dulas ensures that our business interactions do not infer any type of corruption. The organisation regularly bids for work through transparent tender processes and framework agreements. As part of our quality management system all new suppliers and contractors are thoroughly assessed before work is undertaken and a PO is agreed.

Dulas operates a clear delegated authority system that ensures checks and balances over the procurement and sales processes.

Dulas' disciplinary procedure clearly states that the acceptance of bribes or incentives of any sort is misconduct and appropriate action will be taken.

Dulas Ltd refers to and complies with the UK bribery act. The senior management team and directors have had a briefing on the bribery act and are regularly reminded to maintain the register of hospitality given or received.



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Actions

All Heads of Team read, understand and communicate as necessary the brief and full guidance. Heads of Team remind all team members that bribery is illegal and an offence for UK nationals under UK law and ignorance of the law is not a defence. This is included in team meetings.

We maintain a register of hospitality given and received. Awareness of this issue is now covered in our staff induction process.

We updated our anti-bribery policy during 2018 to ensure that it remains suited to the areas in which we work, and that all potential risks are covered.

Measures of outcomes

Departmental teams monitor business interactions to ensure that ethical business practices are maintained.

During the year no disciplinary action was required regarding corruption.

The hospitality register is regularly updated and is reviewed as necessary by our Senior Management Team.