

CORPORATE RESPONSIBILITY STATEMENT

BCL's Corporate Responsibility is about living the values and principles that govern the way we operate as an organisation and behave as individuals. It is about ensuring we sustain safe operations; have a positive impact on our people, the communities we work in and the wider environment; and build the trust and respect of our customers and stakeholders. This Policy Standard relates to the social and non- regulatory aspects of BCL's corporate responsibility model, i.e. conservation issues in the environment as opposed to regulations governing waste disposal. Other Policy Standards address the regulatory aspects in support of BCL's Management System. The standard expected requires the development of systems and procedures that create and deliver sustainable value in relation to the safety of operations, our impact on the environment, engagement in the community and enabling our people to excel.

This should include:

- *Identification and engagement with key stakeholders*
- *Development and implementation of strategy with clear objectives*

defined

- *Embed CR principles in management processes, in particular in relation to bid solutions, operational processes and the supply chain*

- *Appointment of CR Champions with responsibility for the development and maintenance of related systems, processes and reports*

- *Recording and reporting on initiatives undertaken and their impact*

- *Recording and reporting on community investment*

- *Management review at divisional and contract boards*

- *Awareness training and communications to staff so that they understand BCL's approach to CR and business commitments made*

- *Involvement of all staff in the CR process, providing them with the opportunity to contribute ideas as well as their time and skills.*

Introduction

1.1 General

BCL recognises the impact that we make on society, the economy and the planet, and we seek to make a positive difference in the places where we operate. We aim to be good corporate citizens and to support the local communities in which we operate.

This Policy Standard sets out a framework for the development and implementation of Corporate Responsibility activities throughout the BCL Group that supports our values as an organisation.

BCL has defined a Corporate Responsibility Model that describes our

approach in relation to how we look after our people; are successfully integrated into the communities within which we work; take our environmental responsibilities seriously; and above anything else that we are a safe organisation in all aspects of our work.

This Policy Standard relates to the social and non-regulatory aspects of Serco's corporate responsibility model, i.e. conservation issues in the environment as opposed to regulations governing waste disposal. Other Policy Standards address the regulatory aspects in support of BCL's Management System.

This Policy Standard applies to all divisions and business units throughout the BCL Group. It supports the BCL Management System and is issued under the authority of the Chief Executive, BCL Group.

1.2 Definitions

Corporate Responsibility (CR) – is about living the values and principles that govern the way we operate as an organisation and behave as individuals. It is about ensuring we sustain safe operations; have a positive impact on our

people, the communities we work in and the wider environment; and build the trust and respect of our customers and stakeholders.

2 Commitment and Objectives

The objective of our CR approach is to fulfill our social responsibility obligations without compromising our values in the activities that we do. BCL's governing principles are at the heart of everything we do and being socially responsible is, therefore, about living those values. We are committed to ensuring that this responsibility is embedded in the way we do business and should be part of our natural thinking processes.

We aim to create a balance between the development of opportunities with our customers; stimulating and rewarding our staff; working with and supporting our local communities; and sustaining the environment in which we operate.

We aim to create, develop and lead highly motivated teams who have up to date competencies and skills and live Serco's values. We will support our people by:

¥ Stimulating positive and responsive communication. ¥
Supporting learning and development opportunities ¥
Encouraging our staff to realise their full potential.

We have developed a number of policy standards and procedures that include non-discrimination, diversity and equal opportunities.

We maintain a safe, healthy and sustainable working environment for our staff, those we work for and with and the general public.

We recognise our responsibilities for the environment within

which we work by:

- Applying policies and procedures that meet both BCL and legislative requirements
- Promoting the safety, health and welfare of those for whom we are responsible
- Sustaining and improving the environment within which we operate, minimising any negative impact that we may cause.

We have defined health and safety and environmental systems that reflect international standards.

We operate in a large number of communities across Nigeria with diverse cultures and diverse needs.

We aim to support and make a positive impact on these communities by:

¥ Establishing positive relationships stimulating communication and interaction encouraging our staff to become involved providing opportunities for sharing expertise and resources.

We are committed to developing and embedding a socially responsible culture across all our business by:

- Engaging with key stakeholders to understand their needs and expectations
- Providing strategic direction and opportunities to share best practice with other group parts of BCL through

appointment of CR Champions, a CR Steering Group and the development of CR networks

- Providing leadership and support across the organization
- Effectively communicating key messages, strategy and performance

3 Principles

At BCL we all share a responsibility for ensuring that the relationship we have with any of our customers, colleagues, shareholders, contractors or associates are conducted with high standards of honesty, integrity, openness and professionalism. We apply the same standards to the communities in which we live and work.

Our responsible conduct and service ethos have been a strong foundation of BCL's success. For BCL, being socially responsible goes beyond fulfilling legal obligations. It is about how we do business by demonstrating a commitment to health and safety, our people, communities and the environment in which we operate. Our approach to CR has therefore been developed to take account of our unique diversity and devolved structure by ensuring that wherever we work in the world our same standards and values apply.

Therefore rather than imposing a single policy on the size or specific subject of corporate support, each division and business unit should consider where the greatest benefit and value will be delivered relevant to what they do and where they operate.

BCL's approach to CR therefore:

- Reflects our organisational model and operating principles by creating the opportunity to celebrate what is already being done and allowing everyone to be involved in what we do in the future avoids a compliance approach or the adoption of complex and inappropriate external systems
- Avoids putting unnecessary demands on business units provides a mechanism for business units to tell their story and engage their customers and stakeholders on the basis of CR ensures that we work above and beyond any legislative requirements.
- To ensure the implementation of key projects that achieve strategic CR objectives a CR Steering Group has been established for the Group. Its objective is to ensure that we are able to fulfill our obligations in the most effective way and do not compromise our values in the activities that we do. In addition the steering group model should be implemented at both divisional and business unit levels with individuals nominated with specific responsibility for social responsibility. These CR Champions should be recognised as having responsibility for social responsibility in their respective division/business unit, with the authority to implement decisions made. They therefore represent the management team and should be selected for their natural passion and interest in the subject. These Champions are to ensure that we are able to fulfill our obligations in the most effective way and our activities

do not compromise our values.

4 Requirements

BCL business divisions and business units are expected to develop systems and procedures which create and deliver sustainable value in relation to the safety of operations, our impact on the environment, engagement in the community and enabling our people to excel. This should include:

- Identification and engagement with key stakeholders
- Development and implementation of strategy with clear objectives defined
- Embed CR principles in management processes, in particular in relation to bid solutions, operational processes and the supply chain
- Appointment of CR Champions with responsibility for the development and maintenance of related systems, processes and reports
- Recording and reporting on initiatives undertaken and their impact
- Recording and reporting on community investment

- Management review at divisional and contract boards
- Awareness training and communications to staff so that they understand BCL's approach to CR and business commitments made
- Involvement of all staff in the CR process, providing them with the opportunity to contribute ideas as well as their time and skills.

5 Responsibility and Authority

The responsibility for the implementation of this Policy Standard is set out below.

- Responsibility for the achievement of this Policy Standard rests with the BCL Board and the Executive Management Team.
- All staff are responsible for supporting agreed CR activities within the framework of BCL's procedures and directives.
The BCL strategy is adapted to meet local business requirements:
- To ensure that CR principles are included in management processes, in particular operation management and supply chain,
- To establish and actively participate in a business unit CR Committee which is representative of all sections of

its business

- To effectively communicate Company information and messages to employees
- To pro-actively participate in the regional CR network meetings to share best practice and knowledge and to communicate outcomes of meetings to the management teams
- To capture, record and report quarterly CR activities through the agreed reporting process

6 Evidence of Compliance

To demonstrate compliance with this Policy Standard, the following documentation is to be available for audit:

- BCL Corporate Responsibility Policy Standard (this document) - Related policy statements and procedures
- BCL procedures
- Record of CR activities
- Board/management meeting/steering group agenda and minutes.

Managing Director

