The Delivery Group

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.

GDPR

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 CO_2 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.

PROUDLY SUPPORTING LESS PLASTIC.

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 CO_2 travel to work emissions by approximately 30,800kg.
- Cycle to work scheme to help reduce CO_2 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 CO_2 emissions.

Environmental awareness training completed by all staff.

Ethical Policy

1. Purpose

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

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

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

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

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

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

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

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

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 v3-1

Our Commitment to Sustainability

The Delivery Group recognises that it is vital to improve the environmental performance of its operations and supply chain and has developed this Policy to demonstrate its commitment to the environment in which it operates.

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 for the environment is an integral and fundamental part of this commitment. Our aim is to reduce the environmental impact of our operational activities, including the way we provide services to our clients.

Scope & relevant environmental topics

This policy applies to all directors, managers, employees, contractors and temporary workers across The Delivery Group's sites, offices, hubs, fleet operations and mail and parcel services. Where relevant, it also applies to visitors, clients, suppliers and other business partners who may influence, perform work for, or be affected by our environmental performance.

The environmental topics most relevant to The Delivery Group are energy consumption, greenhouse gas emissions, fleet and business travel emissions, renewable electricity procurement, air pollution from transport, materials and consumables, packaging, waste prevention, reuse and recycling, supplier environmental performance, and the environmental impact of mail and parcel services throughout their lifecycle.

Accountability & governance

Directors, Managers and Staff together will take responsibility for this policy and are committed to its success. Overall accountability for this policy rests with the Directors and senior management team. Day-to-day implementation will be coordinated by nominated department heads or site managers, with support from facilities, procurement, fleet, operations and health and safety functions where relevant. Each responsible person will monitor progress in their area, retain suitable evidence and report progress, risks and required actions to senior management as part of the policy review process.

The Company is committed to maintaining high environmental standards, complying with applicable environmental legislation and other relevant obligations, preventing pollution where practicable, and continually improving environmental performance. We will use monitoring data, supplier engagement, staff feedback, operational reviews and new technology developments to identify opportunities to reduce environmental impact.

Our Environmental/Sustainability action plan

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 energy-efficient hubs.
- Solar panel installation at our Warrington hub 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.
- Offset all Scope 1 and 2 emissions until cleaner technologies are available.

Targets & future plans

Appendix 1 sets out the Company's environmental targets. Each target has an owner assigned who tracks current progress status and a formal review of performance against target is conducted annually. Baseline emissions are the reference point against which emissions reduction can be measured. There is no previous reporting and the creation of a new baseline in 2019/20 was due to substantial Group organisational change.

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).

Monitoring, review & communication

The Company will maintain records to monitor progress against environmental commitments and targets. Evidence may include energy procurement records, fuel and fleet data, business travel records, charger installation records, waste and recycling data, supplier communications, procurement decisions, site energy data and carbon calculations. Performance will be reviewed against baseline data and reported to senior management at least annually.

This policy will be reviewed at least annually, or sooner if there are significant changes to operations, legislation, technology, infrastructure or supply chain risks. The review will assess progress against targets, update the action plan, confirm responsibilities and identify any corrective actions required.

The policy will be communicated to employees through induction, internal awareness training, management briefings and internal communication channels such as the intranet or noticeboards. Where appropriate, the policy will also be made available to clients, suppliers and other interested parties through the company website or direct communication.

TDG Key Targets Appendix 1

Target Area	Target Date	Metric/Target	Evidence source
Carbon reduction	2045	Achieve Carbon Net Zero across operations and the supply chain, including relevant Scope 1, Scope 2 and material Scope 3 emissions where data is available.	Energy procurement records; supplier contracts; utility data
HGV Fleet	2040	Transition the HGV fleet to zero-emission vehicles, subject to operationally reliable technology and infrastructure availability.	Fleet data; vehicle procurement records; infrastructure assessments
Carbon reduction	2030	Reduce CO_2 emissions by 50% (Scope 1 and 2)**	SECR reporting
Employee business travel	2030	nsure 100% of private vehicles used for business mileage are fully electric or petrol hybrid.	Business travel records; mileage claims; vehicle declarations
Electricity procurement	2035	Procure 100% of electricity from carbon net neutral or renewable sources.	Energy procurement records; supplier contracts; utility data

** Subject to available technology from manufacturers

Signature of Director:

Name of Director: **Michael Owen**

Position: **Group CEO**

Date: **1st July 2026**

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	
Additional Details relating to the Baseline Emissions calculations.	There is no previous reporting and creation of a new baseline due to substantial Group organisational change.
Baseline year emissions:	

Emissions	TOTAL ($tCO2e$)
Scope 1	
Natural Gas	60.15
Vehicle Fleet	6993.77
SUB-TOTAL	**6943.92**
Scope 2	
Electricity	174.16
SUB-TOTAL	**174.16**
Scope 3	
Grey Fleet	39.44
SUB-TOTAL	**39.44**
TOTAL EMISSIONS	**7157.53**

Carbon Reduction Plan

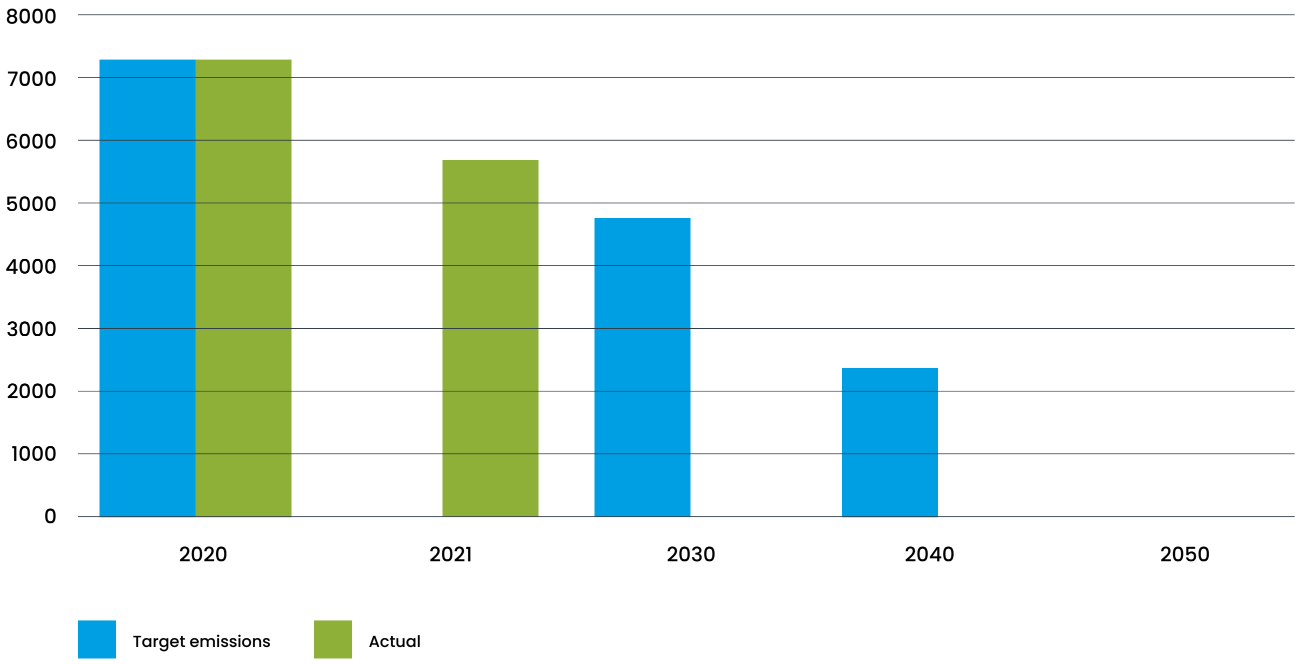
If you would like to learn more, visit:
thedeliverygroup.co.uk

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 tCO2e 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

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 tCO2e, 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

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 reporting2.

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) Standard3.

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:**

[1] https://ghgprotocol.org/corporate-standard
[2] https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting
[3] 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:

James W. Wilkins

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:	Date:
Group CEO	**1st May 2022**

Anti-Bribery Policy

1. Purpose

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

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

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

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

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

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

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

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

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;

Signature of Director:	Name of Director:
	Michael Owen
Position:	Date:
Group CEO	**23rd October 2020**

Certificate of Registration

This is to certify that the Management System of:

The Delivery Group

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

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

ISO 27001: 2013

Certificate Number:	**7537-ISMS-001**
Initial Registration Date:	24/09/2009
Previous Expiry Date:	10/02/2024
Recertification Audit Date:	13/03/2024
Re-issue Date:	27/03/2024
Current Expiry Date:	10/02/2027

Scope of Registration:

The security of data and information related to and used in conjunction with the provision of a postal management services in accordance with the Statement of Applicability v17.

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

Alyn Franklin

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

Certificate of Registration

This is to certify that the Management System of:

The Delivery Group

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

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

ISO 14001: 2015

Certificate Number:	**7537-EMS-001**
Initial Registration Date:	19/12/2012
Previous Expiry Date:	10/02/2024
Recertification Audit Date:	13/03/2024
Re-issue Date:	27/03/2024
Current Expiry Date:	10/02/2027

Scope of Registration:

The provision of Postal Management Services.

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

Alyn Franklin

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

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

Certificate of Registration

This is to certify that the Management System of:

The Delivery Group

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

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

ISO 9001: 2015

Certificate Number:	**7537-QMS-001**
Initial Registration Date:	19/12/2012
Previous Expiry Date:	10/02/2024
Recertification Audit Date:	13/03/2024
Re-issue Date:	27/03/2024
Current Expiry Date:	10/02/2027

Scope of Registration:

The provision of Postal Management Services.

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

Alyn Franklin

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

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Carbon Neutral Britain™

Christina Willoughby

CHRISTINA WILLOUGHBY
Credit Officer

James Poynter

JAMES POYNTER
Director

Carbon Neutral Britain Certification™

IS PRESENTED TO

The Delivery Group Limited

Certified Carbon Neutral

SEPTEMBER 2026 - AUGUST 2027

This certificate is to verify that The Delivery Group Limited has met all Carbon Neutral Britain Certification™ standards in measuring, calculating and carbon offsetting financially controlled carbon emissions selected within the Scope 1 and 2 emissions boundary during the period of 6th April 2025 to 5th April 2026.

Certificate No: BCNB - 06476

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:

United Nations Framework Convention on Climate Change Verified CER

Verified Carbon Standard A VERRA STANDARD

Gold Standard for the Global Goals

Carbon Neutral Britain™

Christina Willoughby

CHRISTINA WILLOUGHBY
Credit Officer

James Poynter

JAMES POYNTER
Director

Certificate of Credit Retirement

IS PRESENTED TO

The Delivery Group Limited

5477.00 Tonnes CO_2e Emissions Offset

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

Batch Serial #: 9101-0039-0084980-VCS-VCU-029-VER-CER-413-092376982365232463

IN THE MONTH OF SEPTEMBER 2026

Certificate No: BCNB - 06476

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

United Nations Framework Convention on Climate Change Verified CER

Verified Carbon Standard A VERRA STANDARD

Gold Standard for the Global Goals