



# CORPORATE SOCIAL RESPONSIBILITY

—  
ANNUAL REPORT

# 2019

Bullitt Group Ltd.

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RG1 1AR, Berkshire, United Kingdom





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# 1. ORGANISATIONAL PROFILE

## 1.1. About this report

Bullitt Group's 3rd Corporate Social Responsibility Annual Report has been established in order to inform our stakeholders about the company's commitment and the improvements that have taken place in the areas of health & safety, environment, governance and social, both within the company itself and its supply chain.

For the first time in Bullitt Group's history for the reporting period 2019: This report has been prepared in accordance with the GRI Standards: Core option.

The company intends to keep the current format of its sustainability report to ensure comparability in the future, enabling stakeholders to analyse changes in the organisation's performance over time, and to support the analysis relative to other organisations.

Bullitt Group report its sustainability performance on an annual basis, including the data presented in previous reports.

Restatements to previous reports have not been made this time.

The company currently does not seek external assurance of the quality of this report.

## 1.2. Offices and operations

(GRI 102-1 – GRI 102-5)

The headquarters of the company is located in Reading, United Kingdom, with significant operations in Reading UK, Taipei City in Taiwan, Shenzhen in China and Charlotte, NC, in the US.

## 1.3. Markets served

(GRI 102-6)

Bullitt Group designs, manufactures, markets and sells mobile phones in partnership with global brands. We are worldwide licensees for Caterpillar and Land Rover selling our products in more than 75 countries.

Major sales territories include:

**Europe** – all countries

**Middle East** – distribution via UAE

**Africa** – South Africa and Northern Africa

**Americas** – US, Canada, Mexico, Costa Rica, Dominican Republic, Colombia, Paraguay, Brazil

**APAC and ANZ** – Australia, New Zealand, Hong Kong

## 1.4. Scale of the organisation

(GRI 102-7, GRI 201)

Bullitt Group employed 132 employees worldwide at the end of 2019.

Manufactured devices in 4 factories in China, operated by ODM partners.

Overall sold 720 000 mobile phones globally, generating net sales 162.69mil\$.

The company reports its financial and economic performance in the Annual Business Report filed at the Companies House, UK.

[Link to the report](#)



### 1.5. Employees (GRI 102-8)

The company's HR department has implemented the People system in late 2018 for managing, controlling and reporting on employee relations. The transactional data collection is supervised by Head of Human Resources. The data represented

below shows the status at the end of 2019.

**Note:** seasonality does not result significant variations in our headcount figures.

**Note:** only an insignificant portion of our activities are performed by workers who are not employees

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**Note:** seasonality does not result significant variations in our headcount figures.

**Note:** only an insignificant portion of our activities are performed by workers who are not employees.

LABOUR		2019	UNIT
Total workers	Global	143	Number of persons
Total employees	Global	132	Number of persons
Employees by contract type	Permanent	132	Number of persons
	Temporary	0	Number of persons
Employees by employment type	Full time	125	Number of persons
	Part Time	7	Number of persons
Employees by age group	Under 30	20	Number of persons
	30 to 50	91	Number of persons
	Over 50	21	Number of persons
Employees by gender	Male	57	Number of persons
	Female	75	Number of persons
Employees by region	EMEA	78	Number of persons
	Americas	20	Number of persons
	APAC	34	Number of persons

### 1.6. Supply Chain

(GRI 102-7, GRI 102-9)

At the end of 2019, we had 60 offices including our headquarter in Reading, UK, manufacturing partners, design and R&D centres. While operating 14 Regional offices worldwide.

We work with our production partners to lead on innovation and maintain the highest standards of production. In 2019 we manufactured 10 different products under 2 licensed global

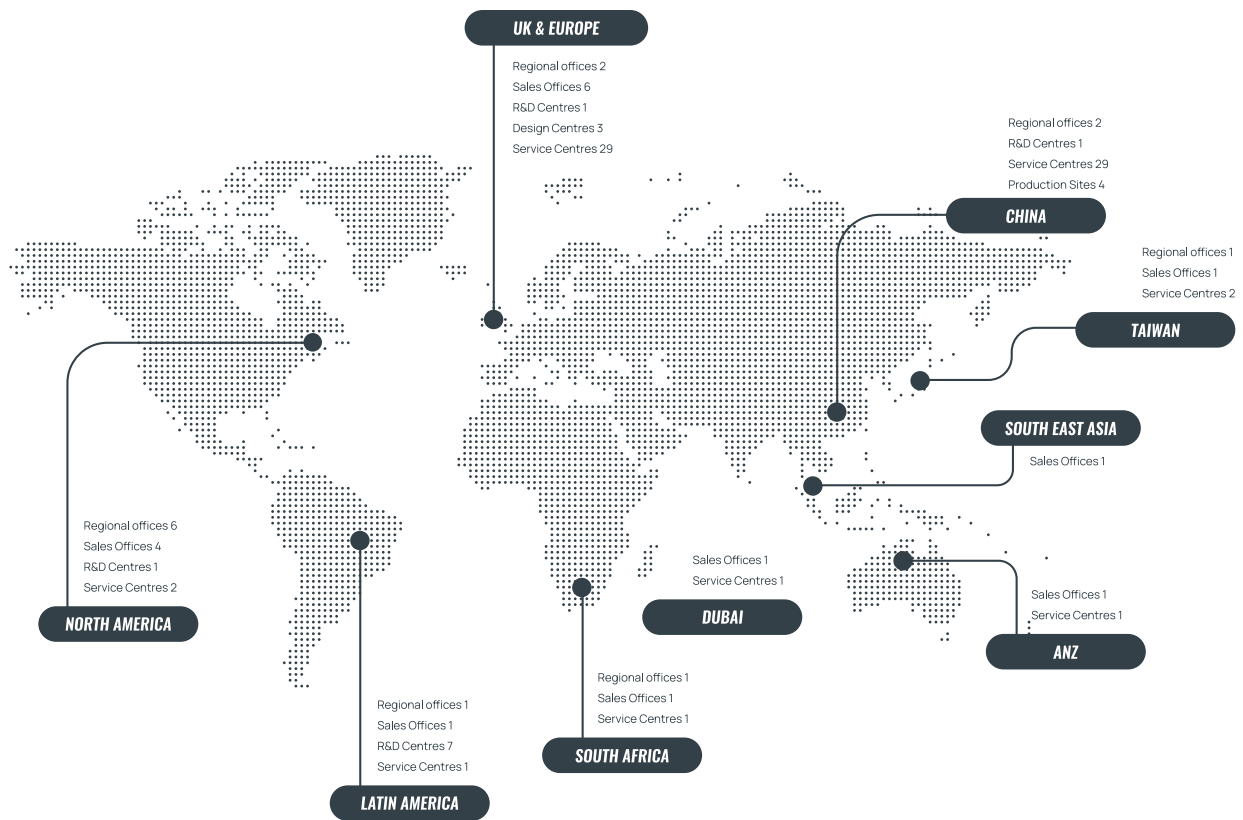
brands – Cat®phones and Land Rover – in 4 manufacturing plants, operated by our first-tier suppliers in China.

More information regarding the products can be found on the [Land Rover](#) and [Caterpillar](#) websites.

Through our retail and distribution network we have unique insights into our local and global markets allowing us to better serve our consumers anywhere in the world.

We provide world class repair and customer services through our trusted suppliers in 50+ countries.

Overall in 2019 we made 100m\$+ payments to suppliers for products and services.



### 1.7. Significant changes (GRI 102-10)

The company publicly reports the most significant changes of its size, structure, ownership and supply chain in the annual business report filed at the Companies House, UK.

[Link to the report](#)

### 1.8. Risk Management (GRI 102-11)

In line with the company's business interests and with the requirements of the ISO9001 standard, we operate a company-wide risk management process. The company selected the PESTLE analysis to review the internal and external factors that impact our business environment and detect risks that require taking actions. The information for the risk evaluation process for operational and financial risks is collected and raised by the heads of departments including the finance department.

Non-financial risks, such as social and environmental risks are identified and managed by the company's Environmental, Social and Governance (ESG) committee. The major risks identified during 2019 include Brexit, US-China trade

relations, supply chain constraints such as material availability and lifecycle, climate crisis, 5G technological change, Eco-design requirements, currency fluctuations.

The risk response measures are prepared and managed by the Heads of departments comprehensively and reviewed by the top management on a quarterly basis.

### 1.9. External initiatives (GRI 102-12, GRI 102-13)

Bullitt Group recognises the value in participating global initiatives that invest in environmentally, socially and economically sustainable future. The company endorses the following initiatives:

We abide by the Code of Conduct of the Responsible Business Alliance (RBA).

We ensure that our labour practices are in line with the ILO labour standards and local regulations.

We comply with the laws and regulations of the countries where we conduct our business, especially the

RoHS, REACH, WEEE and CE European directives.

We put customer safety first by selecting battery packs in line with the requirements of the UL2054 standard.

We share product information on the UL WERCSmart® platform to ensure meeting critical compliance and safety needs.

We prioritise our key suppliers with Responsible Minerals Initiative (RMI) membership. We contribute to and communicate the progress towards selected United Nations Sustainable Development Goals (SDGs).

We maintain an ISO9001 certified management system to drive continuous improvement of our products and services.

We are integrating an environmental management system in accordance with the requirements of ISO 14001.

We participate in the Global Accessibility Reporting Initiative to help consumers find a device with the accessibility features that work best for them.

## 2. STRATEGY

### 2.1. Management Commitment

(GRI 102-14)

We provide innovative and sustainable solutions to new and existing customers; we actively seek opportunities both to improve the environment and to contribute to the wellbeing of the communities in which we do business. Striving for this balance is an integral part of everything we do.

We define sustainability as the enhancement of environmental, health and safety, social and ethical performance through our business activities, employee actions, and community engagement.

Sustainability is a key component of our strategy and to demonstrate the company's continued dedication to improving sustainability throughout the company and its supply chain, we decided to adopt the reporting best practices of the GRI (Global Reporting Initiative) standards. This helps us to understand and manage how our organisation affects communities in

different locations and to identify the topics that have positive or negative local impacts. Our industry's status quo is changing at an increasingly rapid pace.

The digital revolution and technological advancements represent challenges involving major ethical dilemmas that demand responsibility for the sector. At the same time, new technologies can help solve problems, motivating companies to engage in collaboration with all stakeholders to create shared and sustained value.

### 2.2. Sustainability strategy

(GRI 102-14)

Bullitt Group's sustainability strategy is based on the following activities:

- We engage with our stakeholders to understand their needs and expectations
- We identify and measure our significant impact on the economy, the environment and the society
- We collaborate with our partners

and customers to encourage the development of sustainable processes, products and services, down-stream and up-stream

- We drive efficiency in our operations and develop existing and new markets for growth through manufacturing responsible products tailored for the needs of the society

Our current strategic initiatives for sustainability are:

- 1.) Implement and excel sustainability reporting in accordance with the GRI standards
- 2.) Continue obtaining UL110 certifications for our products in the US market
- 3.) Pilot a new product with Eco-label certification in 2021
- 4.) Develop practices to contribute to the selected SDGs
- 5.) Join the Responsible Minerals Initiative latest by 2021 to drive the implementation of minerals supply chain due diligence



# 3. ETHICS

## 3.1. What we stand for

**Our VISION:** We will be the world leader and 'go to' brand for innovative connected devices, focused on customers looking for rugged, durable, outdoor technology to meet their specific needs.

**Our MISSION:** In a complex, technological world, we create connected technology that answers the distinct and practical needs of specific groups of people. We understand the different needs of our customers and don't try to make products for the masses. We listen, involve and collaborate with our customers to create technology for their particular real-world needs, designed to deliver profitable revenue growth for the business.

**Our PURPOSE:** Working with category-leading global brands we make innovative products that others don't and deliver experiences others can't.

## 3.2. Values, principles, standards and norms of behaviour (GRI 102-16)

Bullitt is committed to working to the highest standards with fair employment opportunities for all.

We have an active outreach program for students and we pride ourselves on our collaborative approach to business with our partners.

We look to work with suppliers and partners with similar ethical standards and values.

Our business principles are defined by several policies that follow international trends. These key policies have been reviewed by the ESG committee and approved by the CEO of the company:

### 1.) Ethics

- > Bullitt Group Code of Conduct
- > Business Ethics Policy
- > Bribery, Fraud and Malpractice Policy
- > Flexible Working Policy
- > Expenses Procedure
- > Whistle Blowing Policy
- > Conflict of Interests Policy

### 2.) Privacy

- > Data Protection Policy
- > Social Media Policy

### 3.) Labour

- > Ethical Employment Policy
- > Equal Opportunities Policy
- > Structured interview guide and hiring approval
- > Health and Safety Policy
- > Benefits at Bullitt Group

### 4.) Supply Chain

- > Sustainable Procurement Policy
- > Environmental Policy
- > Conflict Minerals Policy



## 4. GOVERNANCE

### 4.1. Governance (GRI 102-18)

The Board of Directors represent the majority shareholders of the company. Three members of the Board of Directors (the original Founders of the company) acted as Co-CEOs during the reporting period.

The Chairman of the Board and the CEO roles have been separated in 2020 October to ensure independence and transparency, when Nathan Vautier was appointed as CEO of the company.

The Board of Directors supports the management of the company to lead a sustainable growth.

The Board of Directors helps the management to make decisions, resolving legal matters, matters delegated by the shareholders, fundamental business policies and operations, as well as supervising the management.

The Co-CEOs have implemented the organisation that helped the company's operational

transformation after balanced events that led to significant changes in the ownership of the company, including the establishment of Environmental, Social and Governance (ESG Committee). The Board of Directors delegated the responsibility for sustainability to the ESG Committee, chaired by a member of the Board, and its members are selected functional leaders and subject matter experts.

### 4.2. Composition of the Board of Directors

The structure of the Board of Directors at the end of October 2020 is:

NAME	TITLE	2019	UNIT
C Batt	Director (acting Chairman)	5 March 2019	Chairman
J M Austin	Director	5 March 2019	
D Floyd	Director	5 March 2019	
R W Wharton	Director	5 March 2019	

# 5. STAKEHOLDER ENGAGEMENT

## 5.1. Stakeholder groups and their key topics raised

(GRI 102-40, 102-42 - 44)

Engaging with our key stakeholder groups and understanding their needs and expectations is essential for us to establish the company's

strategic and tactical plans, that help us fulfilling our duties. We promote partnership and dialogue with our stakeholders to ensure collaboration and the best materialisation of the opportunities presented to us.

The ESG Committee has identified the stakeholder groups with whom to engage based on their significance of influence on our business and sustainability performance.

STAKEHOLDER GROUP	KEY TOPIC OF INTERESTS	ACTIVITIES
<b>Customers</b> (consulted through onsite visits, meetings)	Products and services that comply with environmental regulations and market expectations with high quality performance. Responsible marketing. Product specifications, energy efficiency, compliance with standards, emissions, hazardous substances, recyclability, disposal. Contractual expectations, commercial challenges, pricing concerns.	Enhance product quality Quality taskforce Weekly field return review Channel marketing management Ethical Business Policy
<b>Governments and governmental bodies</b> (information from monitoring of legislations and government programs)	Industry to embrace and enhance Corporate Social Responsibility, compliance and sustainable growth	Operate the Compliance obligations procedure
<b>Owners and investors</b> (consulted through Board meetings)	Growth, revenue, profit expectations, risk management, transparency, efficiency, achievement of objectives, Environmental Social and Governance information, sustainability development	Focus on growth and efficiency Implement GRI reporting Address material topics Reduce adverse impact on the environment and the society
<b>Employees</b> (consulted through Social dialogue)	Integrity and honesty, safe and healthy working environment, effective communication on company financial, social and environmental performance	Maintain regular dialogue Whistle blower policy Internal communications and training
<b>Suppliers and contractors</b> (consulted through Business meetings)	Specifications of products and services, describing technical, quality, environmental and social requirements Better planning, accurate forecasts, capacity and cost efficiency related expectation	Sustainable procurement policy Regular CSR audits and collaboration on fair trade, responsible minerals, labour practices Product project development
<b>Environmental, health and safety agencies/regulators</b> (information from monitoring of egislations, UN Global Compact, RBA and RMI publications)	Compliance with regulations, accurate and timely reporting, technical data and expertise, analysis of business impacts and input into consultations Specific legislation/regulations, licence/permit compliance and reporting, compliance with emission limits. Health and safety inspections. Ecolabel trends, future regulations, energy standards	Operate the Compliance obligations procedure Integrate the ISO14001 management system Design the first product with Eco-labe
<b>Insurers</b> (consulted through Business meetings)	Business and environmental risks, storage of hazardous materials and access to undertake audits, information security, business continuity	Operate the company wide Risk Management process, supervised by the Board
<b>Society</b> (consulted through customer service and social media interactions)	Energy efficiency, carbon footprint, climate change, waste reduction, pollution reduction, EOL disposal. Innovate to address environmental issues Corporate responsibility/ sustainability reporting	Contribution to the selected SDGs Corporate Social Responsibility Report annually

# 6. REPORTING PRACTICE

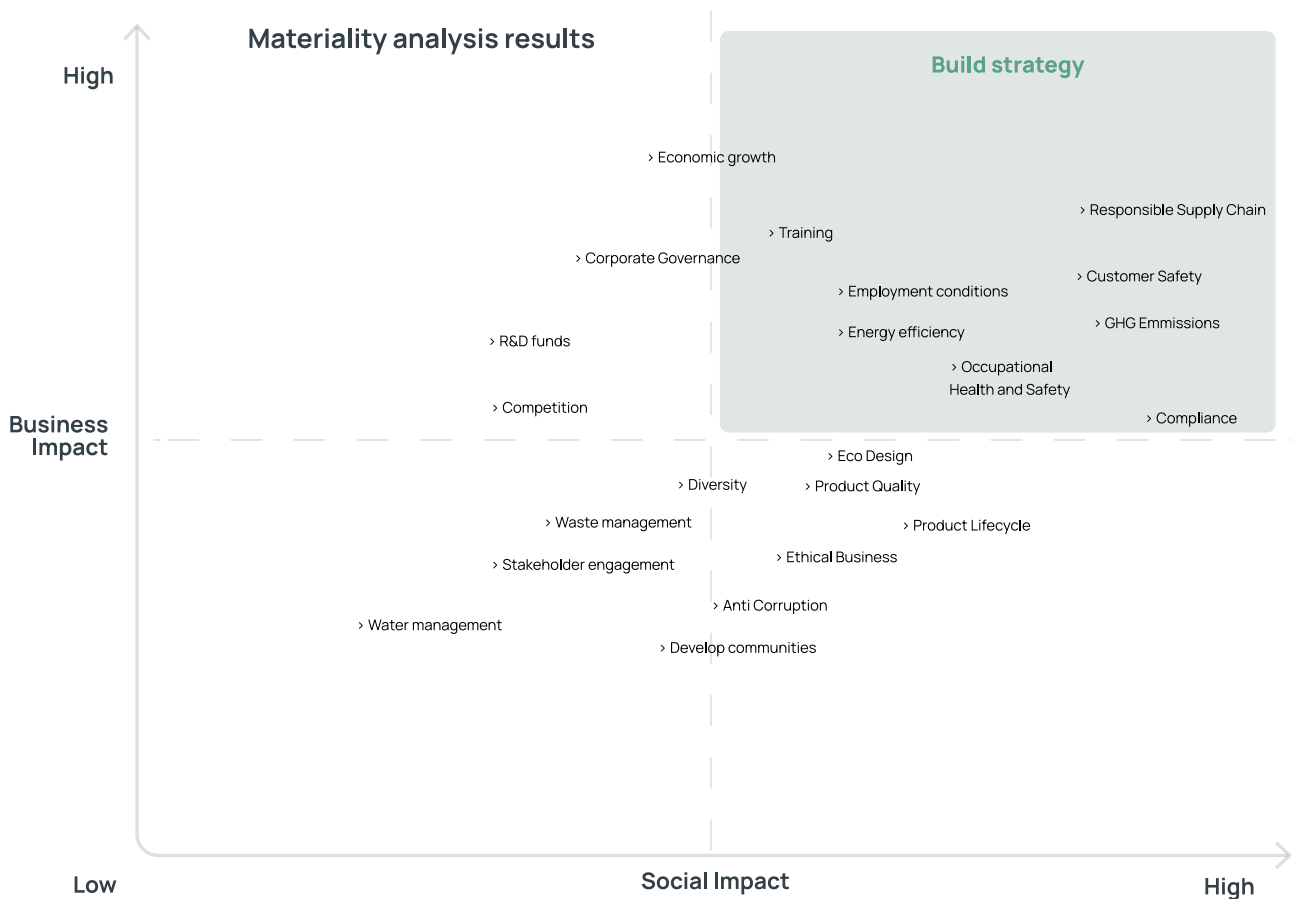
## 6.1. Defining report content and boundaries (GRI 102-46)

The ESG Committee of the company supervised the writing of our annual CSR report, which followed our process:



The boundaries have been defined by the responsible subject matter experts of each area and documented in the management approach in each section.

## 6.2. Materiality (GRI 103-1)



### 6.3. Sustainability priorities (GRI 103-1)

The company prioritised the material issues based on the stakeholder feedback and derived its sustainability strategy to contribute to the UN Sustainability Development Goals:

ISSUE	KEY ACTIONS IN 2019	UN SDG	GRI STANDARD
Climate change	<ul style="list-style-type: none"> <li>Established GHG inventory and energy management practices</li> <li>100% renewable electricity in the head office, UK Developed</li> <li>Strategy for enhanced eco-design in R&amp;D</li> </ul>	Goal 7 Goal 13	302 305
Labour and Human rights	<ul style="list-style-type: none"> <li>Aligned policies with ILO conventions, RBA Code of Conduct, and UN Declaration of Human Rights</li> <li>Trained all internal personnel on Human rights</li> <li>Shared and mandated the policies with key suppliers</li> </ul>	Goal 3 Goal 5 Goal 8 Goal 10	401 403 404 405 406
Responsible supply chain	<ul style="list-style-type: none"> <li>Audited 50% of manufacturing plants against a CSR criterion</li> <li>Found no evidence of child labour or forced labour or other violation of human rights Made progress with agreed improvement actions</li> </ul>	Goal 3 Goal 8 Goal 12	408 409 412 414
Compliance	<ul style="list-style-type: none"> <li>Maintained 100% compliance with environmental, health and safety, business conduct, and customer privacy regulations</li> </ul>	Goal 9 Goal 16	416 417 418



# 7. CLIMATE CHANGE

## [Goal 7]

Ensure access to affordable, reliable, sustainable and modern energy for all

**7.2** - By 2030, increase substantially the share of renewable energy in the global energy mix

**7.3** - By 2030, double the global rate of improvement in energy efficiency

**7.a** - By 2030, enhance international cooperation to facilitate access to clean energy research and technology, including renewable energy, energy efficiency and advanced and cleaner fossil fuel technology, and promote investment in energy infrastructure and clean energy technology

7 AFFORDABLE AND CLEAN ENERGY



## [Goal 13]

Take urgent action to combat climate change and its impacts

**13.3** - Improve education, awareness raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning

13 CLIMATE ACTION



**7.1. Management approach** (GRI 103)

Bullitt Group, making innovative products and services that bring together global brands and connected device technologies, is committed to monitoring, controlling and continually reducing the environmental impact of its operations and the products it sells.

The Environmental, Social and Governance (ESG) committee

is in charge to address energy consumption and GHG emission improvements across the company and its supply chain. While our direct influence is limited to our standard offices, through our suppliers and by the use of our products we indirectly generate a sizeable impact on the environment. We have recognised our responsibility in mitigating the resulting risks, and we take

the required efforts not only to reduce our adverse impacts, but to identify opportunities benefiting the environment and our business. In line with our commitment to the sustainable development philosophy, we are committed to reduce the carbon footprint of the company and our products.

The key elements of our management approach are:



**Key Policies:**

**Environmental Policy** - Created by HR department, reviewed by the ESG Committee; the latest edition is dated September 2020, signed by the CEO of the company.

The company seeks to preserve and where practicable enhance the quality of the environment especially by introducing eco-design features to reduce the environmental impacts from the use and the end-of-life stages of its product lifecycle.

The company has launched its environmental management activities in 2018.

The first year we managed to collate our energy consumption data from verified sources is 2019. Our data from 2019 will serve as the base year for energy consumption and GHG emission reporting in the future. Consequently, we did not have performance targets in place for 2019 and we are not in the position to report historical data for the period before 2019.

The scope of our Environmental Management System – and consequently the scope of this report – are the regional offices that are under the control of the company:

Reading, United Kingdom, with significant operations in Reading UK, Taipei City in Taiwan, Shenzhen in China and Charlotte, NC, in the US.

Sales offices and other, primarily home offices are out of scope, as these are not controlled by the company directly.

The most significant impact of our operations on the environment is our Scope 3 indirect GHG emission, which is broken down to the following categories:

#### Upstream:

- **Category 1** - Purchased goods from our manufacturing suppliers
- **Category 5** - Waste generated during production
- **Category 6** - Business travel
- **Category 7** - Employee commuting

#### Downstream:

- **Category 11** - Use of sold products
- **Category 12** - End-of-life treatment of sold product

The categories marked in yellow are deemed material and are included in our reporting.

Our strategy to mitigate the adverse impact on the environment is built on the three pillars:

#### Energy management

Promote travel and commuting best practices per the internal Energy guideline to employees, and work with tier 1 ODM suppliers and help them reduce energy consumption in production. This will address Categories 1. 5. 6. And 7. (all applicable upstream) and target 10% reduction of energy consumption per million revenue by the end of 2021.

#### Reduction of GHG emission in production

Establish the company's GHG inventory, work with tier 1 ODM suppliers and help them reduce the waste and energy consumption during production. This will address Categories 1. and 5. with the aim to achieve 10% reduction by the end of 2021.

#### Energy efficient product

Complete the Life Cycle Assessment of our latest product line to identify and quantify the significant impacts of our products on the environment. This will result in more informed decisions when implementing eco-design practices, foster the progress of developing energy-efficient products. This will address Categories 11. and 12. with the aim of completing the LCA by the end of 2020 and launch at least one product with eco-label certification in 2021.

#### 7.2. Energy efficiency (GRI 302)

During 2019 we made a good progress to establish our inventory for energy consumption. We included the most significant categories in our report, while we continue working with our value chain to establish measurements for the less significant impacts as described in our management approach in section 7.1.

ENERGY CONSUMPTION WITHIN THE ORGANISATION		2019	UNIT
Fuel consumption	Global	0	GJ
Renewable fuel consumption	Global	0	GJ
Energy consumption – Electricity	UK	163	GJ
	TW	31	GJ
	CN	20	GJ
	US	10	GJ
	<b>Total</b>	<b>225</b>	<b>GJ</b>
Energy consumption – Heating and Cooling	UK	303	GJ
	TW	57	GJ
	CN	38	GJ
	US	19	GJ
<b>Total</b>	<b>417</b>	<b>GJ</b>	
Energy sold	Global	0	GJ
Total energy consumption	Global	641	GJ
ENERGY CONSUMPTION OUTSIDE OF THE ORGANISATION		2019	UNIT
Energy for Production <sup>1</sup> – Category 1	Global	1331	GJ
Energy for Use of sold product <sup>2</sup> – Category 11	Global	16088	GJ
ENERGY INTENSITY		2019	UNIT
Energy consumed for Production – Category 1 per sold units	Global	0.89	MJ/unit
Energy consumed for Production – Category 11 per sold units	Global	1.85	MJ/unit
Energy consumed internally per sold units	Global	22.36	MJ/unit

1. calculated based on the energy intensity data reported by our key manufacturing suppliers 2. calculated based on our 2019 sales, assuming standard use of our products

<b>ENERGY CONSUMPTION REDUCTION</b>		<b>2019</b>	<b>UNIT</b>
Not available yet, as 2019 is our base year for energy consumption data	Global		

<b>REDUCTIONS IN ENERGY REQUIREMENTS OF PRODUCTS</b>		<b>2019</b>	<b>UNIT</b>
Not available yet, as 2019 is our base year for energy consumption data	Global		

### 7.3. GHG Emissions (GRI 305)

Our GHG emission data reflects the energy consumption data reported in section 7.2. We applied the GHG protocol and we used the conversion factors published by the UK Department for Environment, Food & Rural Affairs.

<b>GHG EMISSIONS</b>		<b>2019</b>	<b>UNIT</b>
Scope 1	Global	0	tCO <sub>2</sub> e
Scope 2	CO <sub>2</sub>	96.47	tCO <sub>2</sub>
	CH <sub>4</sub>	0.04	tCO <sub>2</sub> e
	N <sub>2</sub> O	0.6	tCO <sub>2</sub> e
	<b>Total</b>	<b>97.11</b>	tCO <sub>2</sub> e
Scope 3	Production Category 1	304.27	tCO <sub>2</sub> e
	Loss of purchased electricity Category 3	12.79	tCO <sub>2</sub> e
	Use of products Category 1	2.757	tCO <sub>2</sub> e

<b>GHG EMISSIONS INTENSITY</b>		<b>2019</b>	<b>UNIT</b>
GHG emission per sold units <sup>1</sup>		0.13	kgCO <sub>2</sub> e/unit
GHG emission in Production – Category 1 per sold units <sup>2</sup>		0.42	kgCO <sub>2</sub> e/unit
GHG emission in Use of products – Category 11 per sold units <sup>3</sup>		3.83	kgCO <sub>2</sub> e/unit

<b>GHG EMISSIONS REDUCTION</b>		<b>2019</b>	<b>UNIT</b>
Not available yet, as 2019 is our base year for energy consumption data	Global		

The company is not subject of GHG reporting regulations. We have not identified a significant amount of SO<sub>x</sub> and NO<sub>x</sub> and ODS emissions in conjunction with the manufacturing process of our products.

1. Scope 2 Total divided by the total units sold 2. Scope 3 Category 1 divided by the total units sold 3. Scope 3 Category 11 divided by the total units sold

# 8. LABOUR AND HUMAN RIGHTS

## [Goal 3]

Ensure healthy lives and promote well-being for all at all ages

**3.9.** - By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination

**3** GOOD HEALTH AND WELL-BEING



## [Goal 5]

Achieve gender equality and empower all women and girl

**5.1.** - End all forms of discrimination against all women and girls everywhere

**5.5.** - Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision making in political, economic and public life

**5** GENDER EQUALITY



## [Goal 8]

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

**12.6.** - Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle

**8** DECENT WORK AND ECONOMIC GROWTH



## [Goal 10]

Reduce inequality within and among countries

**10.2.** - By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status

**10** REDUCED INEQUALITIES



**8.1. Management approach** (GRI 103)

Our employees globally are our key assets, therefore, the compliance with the International Labour Organisation (ILO) conventions and protocols and the United Nations Declaration of Human Rights are essential to the sustainability of our business.

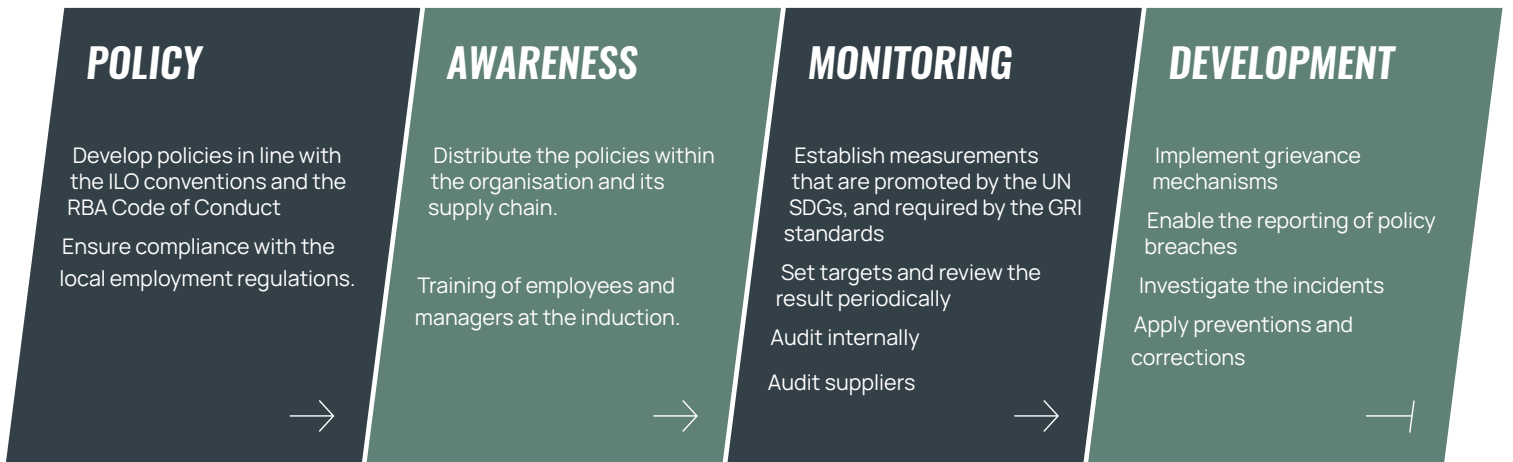
We developed our procedures for managing labour relations in

accordance with the Responsible Business Alliance (RBA) Code of Conduct.

The purpose of our management approach is to ensure compliance with the international norms in the company, as well as in our supply chain. We take a unified management approach to address labour and human rights matters, that includes:

- Ethical Employment
- Occupational health and safety
- Diversity and equal opportunity
- Non-discrimination
- Child labour
- Forced or compulsory labour

The key elements of our management approach are:



The scope of our management approach covers all our offices and employees globally. The ESG committee of the company ensures that regular risk assessment and performance review practices are held, and that all employees are represented in our social dialogue.

**8.2. Employment** (GRI 401)

One of the key pillars of our sustainability is about caring for our employees. We work with a talented team across the globe, we hire great people and encourage them to share their creativity and passion for technological innovation, clearing the way for them to do their best work

**Key Policies:**

**Ethical Employment Policy**

- Created by HR department, reviewed by the ESG Committee; the latest edition is dated September 2020, signed by the CEO of the company.

Bullitt Group is committed to full compliance with the Modern Slavery Act 2015, and its business environment is free from human trafficking, unlawful forced labour and child labour and strongly believes that it has a responsibility for promoting ethical and lawful employment practices throughout its affiliates and its supply chain.

**Structured Interview Guide**

- Created by HR department, the latest edition is dated January

2019, signed by the Head of Human Resources.

Our hiring policy is structured to ensure that we always hire the best candidate within our budget. The Heads of Departments approve the creation of new positions, and the Head of Human Resources manages the job posting and application process. Our hiring managers are fully trained to apply all our Labour related policies during the selection process.

**Whistle Blowing policy** - Created by HR department, the latest edition is dated January 2019, signed by the Head of Human Resources.

All employees have access to the HR department for reporting breaches of these policies. The information provided is treated in the strictest confidence.

<b>NEW HIRES</b>		<b>2019</b>	<b>UNIT</b>
Total new hires	Global	10	Number of persons
New hires by age group	Under 30	5	Number of persons
	30 to 50	5	Number of persons
	Over 50	0	Number of persons
New hires by gender	Male	4	Number of persons
	Female	6	Number of persons
	EMEA	7	Number of persons
	Americas	1	Number of persons
	APAC	2	Number of persons

<b>TURNOVER</b>		<b>2019</b>	<b>UNIT</b>
Total turnover	Global	71 (54%)	Number of persons (%)
Turnover by age group	Under 30	7 (5%)	Number of persons (%)
	30 to 50	52 (39%)	Number of persons (%)
Turnover by gender	Over 50	12 (9%)	Number of persons (%)
	Male	50 (38%)	Number of persons (%)
Turnover by region	Female	21 (16%)	Number of persons (%)
	EMEA	54 (41%)	Number of persons (%)
	Americas	4 (3%)	Number of persons (%)
	APAC	13 (10%)	Number of persons (%)

<b>BENEFITS</b>			
<b>UK</b>	<b>US</b>	<b>TW</b>	<b>CN</b>
Pension	401(k) Plan	Vouchers & bonuses	State benefits
Health insurance	Health insurance	Health check-up	5 x social insurance & 1 x housing fund
Life insurance	Health Reimbursement	Health Insurance	Physical examination
Season ticket loan	Dental	Life insurance	Annual travel for employees
Childcare vouchers	Vision		Employee birthday benefits
Employee discount scheme	Life insurance		Traditional festival benefits
Pension	Long Term Disability		

<b>PARENTAL LEAVE</b>		<b>2019</b>	<b>UNIT</b>
Total number of employees that were entitled to parental leave	Male	2	Number of persons
	Female	8	Number of persons
Total number of employees that took parental leave	Male	2	Number of persons
	Female	8	Number of persons
Total number of employees that returned to work in	Male	2	Number of persons
	Female	8	Number of persons
Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work	Male	2	Number of persons
	Female	7	Number of persons
Return to work rate		100	%
Retention rate		90%	%

### 8.3. Occupational health and safety (GRI 403)

Our offices comply with the terms of the Health and Safety at Work etc. Act 1974, subsequent legislation and it aims to provide and maintain a healthy and safe working environment. The health and safety objective of the company is to minimise the number of instances of occupational accidents and illnesses and ultimately achieve an accident-free workplace.

We implemented a Health and Safety Policy and consequent procedures to report, manage and mitigate the risks of adverse impact on workers' health and safety. One of the company's ongoing project is to develop the system to achieve compliance with the ISO 45001 Occupational health and safety standard and to integrate it in our certified ISO9001 QMS.

#### Key Policies:

**Health and Safety Policy** - Created by HR department, reviewed by the

ESG Committee; the latest edition is dated September 2020, signed by the CEO of the company.

All our employees have completed the Health and Safety training at induction.

Our workers' workplaces and work that are under our control, do not represent a high risk of incidents or a high risk of diseases, as 100% of our work is done in standard office environment.

EMPLOYEES STATISTICS	UK		US		TW		CN	
	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Injury rate (IR)	0	0	0	0	0	0	0	0
Occupational disease rate (ODR)	0	0	0	0	0	0	0	0
Lost day rate (LDR)	0	0	0	0	0	0	0	0
Absentee rate (AR)	1.09	0.52	0.45	0.71	1.53	2.75	0	0.33
Work-related fatalities	0	0	0	0	0	0	0	0
OTHER WORKERS STATISTICS								
Injury rate (IR)	0	0	0	0	0	0	0	0
Occupational disease rate (ODR)	0	0	0	0	0	0	0	0
Lost day rate (LDR)	0	0	0	0	0	0	0	0
Absentee rate (AR)	0	0	0	0	0	0	0	0
Work-related fatalities	0	0	0	0	0	0	0	0

### 8.4. Training and education (GRI 404)

The competence management in our company is an integrated cycle of activities to ensure that competence levels are at an appropriate level as well as further developing and improving future competence at work of all employees.

**1. Selection process:** The company has procedures in place to ensure that all approved vacancies are filled by individuals with the appropriate qualifications and experience to meet the requirements of the position. All recruitment and selection is undertaken in accordance with

relevant legislation. Bullitt Group employees are selected based on their competency, capability, experience, training and subsequent ability to carry out the activities. This is evidenced by appropriate documented records (including the employee's CV and our external reference checks) in accordance with our procedures.

**2. Induction process:** On induction, all employees receive training on the following areas:

- Company structure and individual responsibilities
- Integrated Management System

awareness training, including the specific Energy Guidelines

Health & Safety requirements including fire and evacuation procedure

IT training and access to company systems

Code of Conduct and company policies

**3. Performance management:** Managers are expected to coach their employees on an ongoing basis and initiate training (both 'on the job' and external) as and when required.

#### 4. Training and Development:

The company recognises the importance of training and development in order to maintain and improve standards of performance and to maximise employee development. Competency needs are identified through business plans, the performance appraisal process as well as specific project

needs. Requirements are met through recruitment, training or other development actions to achieve appropriate levels of competency, experience and capability.

**5. Effectiveness of training:** Training is evaluated by the line manager, assisted by the HR.

We provide the required support to employees who are affected by

significant transition of their roles including potential redundancy. These activities include cross-training to ensure continued employability, or severance payment and job placement assistance on the expenses of the company in case of termination of the employment agreement by the company due to redundancy.

CAREER DEVELOPMENT	2019		UNIT
	MALE	FEMALE	
Number of employees received training	53	47	Number of persons
Average annual training hours per employee	0.75	2	Hours
	1.25	4.3	Hours
	4.4	3.2	Hours
Performance and career development reviews held	-	-	%
	61	63	%
	65	67	%

#### 8.5. Diversity and equal opportunity (GRI 405)

We are committed to encouraging diversity amongst our workforce. We believe that all employees are entitled to be treated with dignity and respect while at work.

It is our intention to provide equality of opportunity and conditions of employment and engagement to our employees, irrespective of gender,

marital status, race, nationality, disability, sexual orientation, religion or belief, age or trade union membership and activity.

#### Key Policies:

**Equal Opportunities and Diversity Policy** - Created by HR department, reviewed by the ESG Committee; the latest edition is dated January 2019, signed by the COO of the company.

Our HR department supervises the processes and ensure that equal

opportunities are granted throughout the organisation when:

- deciding promotion and career development opportunities
- deciding on Terms and Conditions of employment
- approving employment-related benefits
- handling grievance handling and applying disciplinary procedures
- deciding on redundancies

DIVERSITY IN GOVERNANCE BODIES		2019		UNIT
		MALE	FEMALE	
Board	Under 30	0	0	%
	30 to 50	0	0	%
	Over 50	100	0	%
Executive management	Under 30	0	0	%
	30 to 50	51	32	%
	Over 50	17	0	%
ESG Committee	Under 30	0	0	%
	30 to 50	40	40	%
	Over 50	20	0	%

EQUAL PAY		UK		US		TW		CN		UNIT
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	
Ratio of salary and remuneration women to men <sup>1</sup>	Executives	100	-	100	108	-	-	-	-	%
	Managers	100	103	100	71	-	-	100	104	%
	Staff	100	87	100	103	100	88	100	92	%

<sup>1</sup> Equal pay calculation is based on full time employees who were employed for the full calendar year 2019 (i.e.: removed those on parental leave, any new starters or leavers during the year 2019).

**8.6. Non-discrimination** (GRI 406)

The Company's policies for recruitment, advancement and retention of employees forbid discrimination on grounds of, including but not limited to race, colour, sex, religion, political opinion, national extraction, or social origin as defined by the ILO. Our policies are designed to ensure that employees are treated, and treat each other, fairly and with respect and dignity.

**Key Policies:**

**Preventing Discrimination Policy** - Created by HR department, reviewed by the ESG Committee; the latest edition is dated January 2019, signed by the COO of the company.

Bullitt Group endeavours to ensure that no employee is discriminated against, either directly or indirectly, on grounds of age, gender, race, nationality, ethnic origin, marital status, disability, religious belief, part time status or sexual orientation. This commitment to preventing

discrimination applies to all aspects of the employment including the recruitment and selection, interviews, employment contract negotiations, training, performance management, disciplinary proceedings or terminations.

**Whistle Blowing policy** - Created by HR department, the latest edition is dated January 2019, signed by the Head of Human Resources.

All employees have access to the HR department for reporting breaches of these policies. The information provided is treated in the strictest confidence.

<b>INCIDENTS OF DISCRIMINATION</b>		<b>2019</b>	<b>UNIT</b>
Number of incidents reported		0	Number of incidents
Status of remediation	Incident reviewed	0	Number of incidents
	Remediation in progress	0	Number of incidents
	Remediation implemented	0	Number of incidents
	Action no longer required	0	Number of incidents



# 9. RESPONSIBLE SUPPLY CHAIN

## [Goal 3]

Ensure healthy lives and promote well-being for all at all ages

**3.9.** - By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination

**3** GOOD HEALTH AND WELL-BEING



## [Goal 8]

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

**8.7.** - Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms

**8.8.** - Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment

**8** DECENT WORK AND ECONOMIC GROWTH



## [Goal 12]

Ensure sustainable consumption and production patterns

**12.6.** - Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle

**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



## 9.1. Child labour, Forced and compulsory labour (GRI 408, GRI 409)

Child labour as well as forced and compulsory labour are serious threats socially and to the sustainable economic growth. We are committed to the call of UN SDG 8.7 Alliance, “joining forces globally to end child labour, forced labour, modern slavery and human trafficking”.

### Key Policies:

**Ethical Employment Policy** - Created by HR department, reviewed by the ESG Committee; the latest edition is dated September 2020, signed by the CEO of the company.

Bullitt Group is committed to full compliance with the Modern Slavery Act 2015, and its business environment is free from human trafficking, unlawful forced labour and child labour and strongly believes that it has a responsibility for promoting ethical and lawful employment practices throughout its affiliates and its supply chain.

Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and monitor any issue of modern slavery in the supply chain.

The company’s zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced, as appropriate, thereafter.

The company will not obtain products or services from organisations using child labour or forced labour.

The Company’s contracted suppliers will:

- Comply with local and international employment regulations
- Comply with all applicable international labour organisation (ILO 138 and 182) conventions and protocols and the United Nations Declaration of Human Rights
- Not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty
- Ensure that the overall terms of employment are voluntary
- Comply with the minimum age requirements prescribed by the applicable laws
- Compensate its workers with wages and benefits that meet legal requirements
- Abide by applicable laws concerning the maximum hours of daily labour
- Not engage in any practice of slavery, forced labour, compulsory labour and/or human trafficking
- Be able to demonstrate compliance with this Policy

Our risk management process identified our manufacturing partners as high risk for child labour and forced labour, as the manufacturing plants

are located in China, and China has not reported official statistics to the ILO regarding child labour.

Therefore, we maintain adequate control mechanisms to ensure the compliance of our suppliers. These controls include:

- Provisions of the prohibition of child labour and forced labour in our manufacturing agreements
- Communication of our Sustainable Procurement Policy which includes our Ethical Employment Policy
- Regular CSR audits at our manufacturing plants, which include the assessment of zero tolerance for child labour, ‘young workers’ and their working conditions, and their exposure to hazardous materials

We audited two out of four of our key manufacturing plants during 2019. One concluded with no ‘young workers’ employed, the other employed ‘young workers’, all of them above the minimum age requirements of the country (16 years in CN), with special working conditions such as no overtime, and no handling of hazardous materials. No evidence of child labour incidents found.

CHILD LABOUR, FORCED LABOUR	2019	UNIT
High-risk suppliers for incidents of child labour	4	Number of suppliers
Child labour incidents	0	Number of suppliers
Young workers exposed to hazardous materials	0	Number of suppliers
Manufacturing plants	4	Number of suppliers
Suppliers in high-risk countries of child labour	4	Number of suppliers
High-risk suppliers for incidents of forced labour	4	Number of suppliers
Forced labour incidents	0	Number of suppliers
Suppliers in high-risk countries of forced labour	4	Number of suppliers



## 9.2. Human rights assessments

(GRI 412)

We periodically evaluate the level of labour and human rights compliance and monitor improvement activities.

We maintain a database of the employment conditions with the help of our People system to ensure continuous compliance. Consequently, our internal offices are not considered high-risk operations.

Human rights assessment at our manufacturing plants are subject of our regular Supplier CSR assessments, that we conduct at new product launches.

HUMAN RIGHTS ASSESSMENTS	2019	UNIT
High-risk operations (internal)	0	Number of offices
High-risk operations (external)	4	Number of suppliers
High-risk operations assessed	2	Number of operations
Human rights training hours	20	Number of suppliers
Human rights training completed	7	Number of suppliers
Significant investment agreements including human rights clauses <sup>1</sup>	34	Number of suppliers
Forced labour incidents	88	Number of suppliers

## 9.3. Supplier Social Assessment

(GRI 414)

We are committed to preventing and mitigating negative social impacts in our supply chain.

We apply our Sustainable Procurement Policy when selecting and working with our key Suppliers. An important element of our control mechanisms in place is a CSR assessment process

supported by a robust set of social criteria, including human rights, employment practices such as wages and working hours, health and safety practices. Our goal is to maintain a progress on social, environmental and quality performance.

### Key Policies:

**Sustainable Procurement Policy** - Created by HR department, reviewed

by the ESG Committee; the latest edition is dated September 2020, signed by the CEO of the company.

Bullitt Group seeks to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically in its supply chain.

<sup>1</sup> Significant investment agreements are defined as tier 1 manufacturing suppliers and repair service suppliers

The company requires its equipment, manufacturing and intellectual services suppliers to comply with the following policies:

- Ethical Employment Policy – to uphold the human rights of workers, and to treat them with dignity and respect as understood by the RBA Code of Conduct.
- Health and Safety Policy – to operate in a safe and healthy work environment to minimise the incidence of work-related injury and illness
- Environmental Policy – to encourage active participation in

minimising the adverse impacts on the environment, to use resources responsibly and to safeguard biodiversity.

- Business Ethics Policy – to ensure that business is conducted openly and fairly and to prohibit bribery and corruption in accordance with regulations and international practices.
- Conflict Minerals Policy – to reasonably assure that the tantalum, tin, tungsten and gold in our products do not finance armed groups of the DRC or an adjoining country.

→ Quality Policy – to promote the maintenance and continual improvement of management systems to manufacture high-quality products in continuous compliance with obligations.

The company is committed to assess its existing and potential suppliers against its Corporate Social Responsibility criteria, to set improvement objectives and monitor performance, to provide training and to assist in driving corrective and preventing actions.

CSR ASSESSMENTS	2019	UNIT
New suppliers assessed	1	Number of suppliers
New and existing suppliers assessed in total	2	Number of suppliers
Significant negative social impacts identified <sup>1</sup>	1	Number of suppliers
Suppliers with Improvements agreed	100	% of suppliers
Suppliers terminated as a consequence of	0	% of suppliers
Significant investment agreements including human rights clauses <sup>1</sup>	34	Number of suppliers
Forced labour incidents	88	% of suppliers

1. The negative social impacts identified include overtime, payment, and health and safety issues. Total 9 improvement actions have been agreed, of which 4 has been closed. Our Quality and ODM management department continues to work closely with the supplier to resolve the remaining issues.



# 10. COMPLIANCE

## [Goal 9]

**Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation**

**9.c** - Significantly increase access to information and communications technology and strive to provide universal and affordable access to the Internet in least developed countries by 2020hazardous chemicals and air, water and soil pollution and contamination

**9** INDUSTRY, INNOVATION AND INFRASTRUCTURE



## [Goal 16]

**Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels**

**16.3.** - Promote the rule of law at the national and international levels and ensure equal access to justice for all

**16** PEACE, JUSTICE AND STRONG INSTITUTIONS



## 10.1. General compliance

### management approach (GRI 103)

Respecting our compliance obligations is our way to mitigate the risks of our general business conduct. Our ESG committee is tasked

to maintain a list of compliance obligations, to identify the activities to achieve and maintain compliance, to ensure the distribution of the information internally, and to set objectives for the organisation.

The most important compliance

obligations that are applicable to our business globally or to most of our products, voluntary or mandatory, regulatory or standard, are listed in the table below:

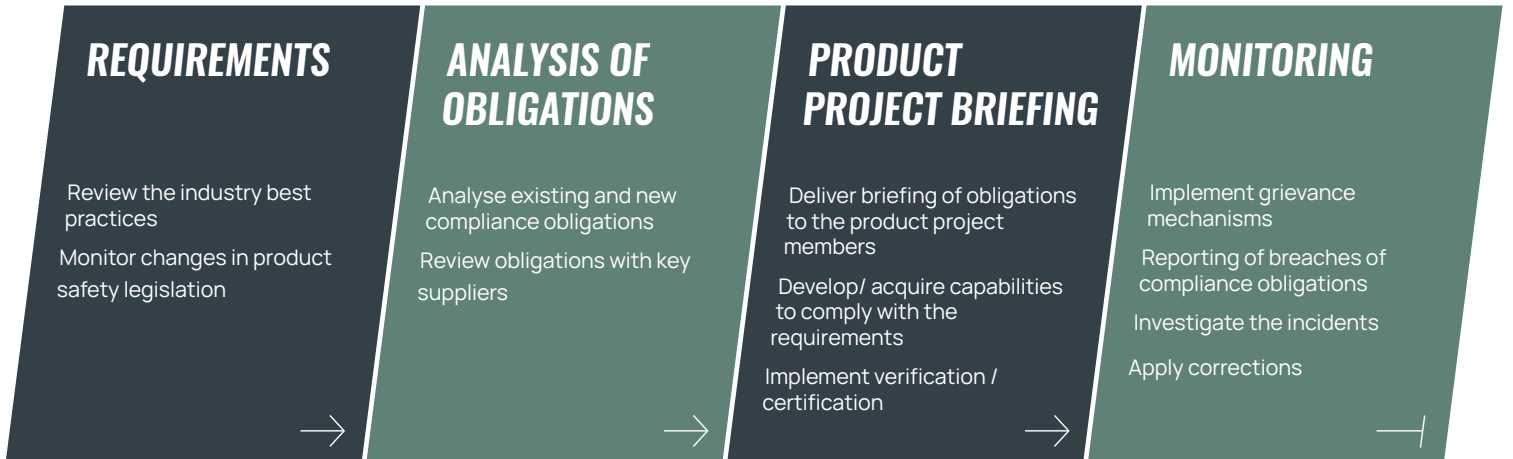
OBLIGATION	DESCRIPTION	OBJECTIVE
UL110 compliance	Products sold to carriers in the US must be certified for UL110	Certify S48c and future products
CTS Approval	All Google Android software must be CTS approved prior to releasing commercially.	CTS approve all Google Android commercial releases.
ISO19011	Internal audit program shall be ISO19011 compliant software must be CTS approved prior to releasing commercially.	Develop ISO19011 compliant internal audit programme
ISO9001	Quality Management system must be ISO9001 certified	Ensure ongoing compliance and valid certification with ISO9001
REACH	Aims to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances.	Ensure that all products are REACH certified
ROHS 2	EU legislation restricting the use of hazardous substances in electrical and electronic equipment (EEE)	Ensure that all products are ROHS 2 certified
CE	CE markings signify that products sold in the EEA have been assessed to meet high safety, health, and environmental protection requirements.	Ensure that all products are CE marked
Competition / anti-trust law	Promotes or seeks to maintain market competition by regulating anti-competitive conduct by companies	Ensure our business practices do not unfairly distort the markets in which we operate in breach of the law
Modern Slavery law	Prevent slavery, servitude, forced or compulsory labour and human trafficking	Guard against the use of forced labour or similar anywhere in our supply chain
Anti-bribery law	It is illegal to offer, promise, give, request, agree, receive or accept bribes	Take steps to prevent bribery impacting any part of our business
Data privacy law	The rights of privacy of data subjects must be respected	Ensure ongoing compliance with data privacy law in each of the territories we operate in.
Anti-facilitation of tax evasion law	Prevent the facilitation of tax evasion by or involving employees, workers or other associated persons,	Adopt policies and procedures to prevent facilitation of tax evasion
Health & Safety law	Ensure a safe working environment for our staff and visitors, and that products manufactured must be safe for use by customers	Control risks to people's health and safety from our work and business activities
Company and accounting law	Registered companies must comply with all laws on regulation of corporate entities in each jurisdiction they are registered.	Ensure records and filings are maintained to demonstrate compliance.
Sanctions and export control	Measures undertaken by governments that restrict or limit the financial activity of a sanctioned entity, including their ability to trade	Respect sanctions and export controls and ensure we do not act in contravention of such
Intellectual property rights	Protect the interests of those who create intellectual property	Adopt methods for identifying applicable IPRs and ensure that have permission to use where appropriate.
Employment law	Regulates the relationship between employers and employees and governs what employers can expect from employees, what employers can ask employees to do, and employees' rights at work.	Respect employment laws applicable in each jurisdiction where we employ people
Consumer law	Enshrines the rights of consumers to protect them against unfair trading and contract practices.	Have policies and procedures to ensure that consumer rights are respected

**10.2. Customer safety, marketing and labelling** (GRI 416, GRI 417)

It is our responsibility to bring products to the market that are not only innovative, eco-friendly, and fair value for money, but also, that are safeguarding the health and well-being of our customers when using our products.

Consequently, we have built customer safety deep into our product design and development processes.

The key elements of our management approach are:



Our commitment to customer safety is reflected by the following activities:

- RoHS2 certification of all products
- REACH certification of all products
- CE certification of all products
- WEEE report of all products
- Batteries UL2054 conform
- Publishing the declaration of conformity for all products

- Sharing product information via the UL WERCSmart® platform
  - Monitoring complaints on the US Consumer Product Safety Commission platform
  - Listening to customer feedback in our Customer Service centres
  - Analysis of safety feedback by our design engineers
- Derived from these regulations and standards, we also comply with all

applicable labelling requirements, and we place them on the products, on the packaging, or online as required.

To top all the precautionary actions, we also include product safety instructions in our User manuals for our customers to better understand the safety risks associated with the use of our products and to avoid potential adverse impact on their health and well-being.

CUSTOMER SAFETY	2019	UNIT
Ratio of products for which health and safety impacts are assessed for improvement.	100	%
Total number of non-compliance incidents with safety requirements	0	Number of incidents
Labelling requirements - source	100	%
Labelling requirements - content	100	%
Labelling requirements - Safe use	100	%
Labelling requirements - disposal	100	%
Compliance with labelling requirements	100	% of products
Total number of non-compliance incidents with labelling requirements	0	Number of incidents

**10.3. Customer privacy** (GRI 418)

We pay an absolute respect to our customer’s privacy. We understand that our customers’ personal data belongs to them, and we only use such data in relation with the providing of the products and services to the individuals.

The key elements of our management approach are:



Our data collection and management processes and systems are built on and are fully compliant with the EU General Data Protection Regulation. All employees have completed an external GDPR training followed by a test to ensure the effectiveness of the training.

Our commitment to customer privacy is reflected by the following activities:

- We only collect customer personal data when we need them.

- We inform our customers of our processing in a transparently, via our Privacy Policies on the product websites
- We have an assigned a Data Protection Officer (DPO) who is the expert of our privacy work
- We process data access requests of customers efficiently, through our Customer Service department
- We regulate the responsibility between us and our suppliers in our dedicated Data Protection agreements (DPA).

- In collaboration with our suppliers we keep an accurate data inventory.
- We have an incident management process for personal data breach (loss, destruction or unauthorised access to personal data), and we respond with risk mitigation promptly.
- We analyse possible risks and impacts on customers’ rights for the intended use of personal data.

<b>CUSTOMER PRIVACY</b>	<b>2019</b>	<b>UNIT</b>
Total substantiated complaints	0	Number of complaints
External complaints	0	Number of complaints
Regulatory complaints	0	Number of complaints

# 11. GRI CONTENT INDEX (GRI 102-55)

GRI STANDARD 2016 GRI 102 GENERAL DISCLOSURES	STANDARD	DESCRIPTION	PAGE	COMMENT
Organizational Profile	102-1	Name of the organization	1	
	102-2	Activities, brands, products, and services	4	
	102-3	Location of headquarters	4	
	102-4	Location of operations	4	
	102-5	Ownership and legal form	4	
	102-6	Markets served	4	
	102-7	Scale of the organization	4	
	102-8	Information on employees and other workers	5	
	102-9	Supply chain	5 - 6	
	102-10	Significant changes to the organization and its supply chain	6	
	102-11	Precautionary Principle or approach	6	
	102-12	External initiatives	6	
	102-13	Membership of associations	6	
Strategy	102-14	Statement from senior decision-maker	7	
	102-15	Key impacts, risks, and opportunities		
Ethics and integrity	102-16	Values, principles, standards, and norms of behavior	8	
	102-17	Mechanisms for advice and concerns about ethics		
Governance	102-18	Governance structure	9	
	102-19	Delegating authority		
	102-20	Executive-level responsibility for economic, environmental, and social topics		
	102-21	Consulting stakeholders on economic, environmental, and social topics		
	102-22	Composition of the highest governance body and its committees		
	102-23	Chair of the highest governance body		
	102-24	Nominating and selecting the highest governance body		
	102-25	Conflicts of interest		
	102-26	Role of highest governance body in setting purpose, values, and strategy		
	102-27	Collective knowledge of highest governance body		
	102-28	Evaluating the highest governance body's performance		
	102-29	Identifying and managing economic, environmental, and social impacts		
	102-30	Effectiveness of risk management processes		
	102-31	Review of economic, environmental, and social topics		
	102-32	Highest governance body's role in sustainability reporting		
	102-33	Communicating critical concerns		
	102-34	Nature and total number of critical concerns		
102-35	Remuneration policies			
102-36	Process for determining remuneration			
102-37	Stakeholders' involvement in remuneration			
102-38	Annual total compensation ratio			
102-39	Percentage increase in annual total compensation ratio			
Stakeholder engagement	102-40	List of stakeholder groups	10	
	102-41	Collective bargaining agreements		No collective bargaining agreements
	102-42	Identifying and selecting stakeholders	10	
	102-43	Approach to stakeholder engagement	10	
	102-44	Key topics and concerns raised	10	
Reporting Practice	102-45	Entities included in the consolidated financial statements		Refer to the business report
	102-46	Defining report content and topic boundaries	11	
	102-47	List of material topics	11	
	102-48	Restatements of information	4	No statements
	102-49	Changes in reporting	4	
	102-50	Reporting period	4	
	102-51	Date of most recent report	4	
	102-52	Reporting cycle	4	
	102-53	Contact point for questions regarding the report	34	
	102-54	Claims of reporting in accordance with the GRI Standards	4	
	102-55	GRI content index	31	
	102-56	External assurance	4	

<b>GRI STANDARD 2016</b>	<b>STANDARD</b>	<b>DESCRIPTION</b>	<b>PAGE</b>	<b>COMMENT</b>	
<b>GRI 103 MANAGEMENT APPROACH</b>					
	103-1	Explanation of the material topic and its Boundary	11 - 12		
	103-2	The management approach and its components	11 - 12		
	103-3	Evaluation of the management approach	9		
<b>GRI 200 ECONOMIC STANDARDS</b>					
<b>Economic Performance</b>	201	Management Approach	4	Refer to the business reportThe company reports its financial and economic performance in the Annual Business Report, filed at the Companies House, UK.	
	201-1	Direct economic value generated and distributed	4		
	201-2	Financial implications and other risks and opportunities due to climate change	4		
	201-3	Defined benefit plan obligations and other retirement plans	4		
	201-4	Financial assistance received from government	4		
<b>Market Presence</b>	202	Management Approach	4		
	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	4		
	202-2	Proportion of senior management hired from the local community	4		
<b>Indirect Economic Impacts</b>	203	Management Approach	4		
	203-1	Infrastructure investments and services supported	4		
	203-2	Significant indirect economic impacts	4		
<b>Procurement Practices</b>	204	Management Approach	4		Link to the report
	204-1	Proportion of spending on local suppliers	4		
<b>Anti-Corruption</b>	205	Management Approach	4		
	205-1	Operations assessed for risks related to corruption	4		
	205-2	Communication and training about anti-corruption policies and procedures	4		
	205-3	Confirmed incidents of corruption and actions taken	4		
<b>Anti-Competitive Behavior</b>	206	Management Approach	4		
	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	4		
<b>GRI 300 ENVIRONMENTAL STANDARDS</b>					
<b>Materials</b>	301	Management Approach			
	301-1	Materials used by weight or volume			
	301-2	Recycled input materials used			
	301-3	Reclaimed products and their packaging materials			
<b>Energy</b>	302	Management Approach	13-15		
	302-1	Energy consumption within the organization	15		
	302-2	Energy consumption outside of the organization	15		
	302-3	Energy intensity	15		
	302-4	Reduction of energy consumption	16		
	302-5	Reductions in energy requirements of products and services	16		
<b>Water</b>	303	Management Approach			
	303-1	Water withdrawal by source			
	303 - 2	Water sources significantly affected by withdrawal of water			
	303-3	Water recycled and reused			
<b>Biodiversity</b>	304	Management Approach			
	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas			
	304-2	Significant impacts of activities, products, and services on biodiversity			
	304-3	Habitats protected or restored			
	304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations			
<b>Emissions</b>	305	Management Approach	13-15		
	305-1	Direct (Scope 1) GHG emissions	16		
	305-2	Energy indirect (Scope 2) GHG emissions	16		
	305-3	Other indirect (Scope 3) GHG emissions	16		
	305-4	GHG emissions intensity	16		
	305-5	Reduction of GHG emissions	16		
	305-6	Emissions of ozone-depleting substances (ODS)	16		
	305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	16		

<b>GRI STANDARD 2016</b>	<b>STANDARD</b>	<b>DESCRIPTION</b>	<b>PAGE</b>	<b>COMMENT</b>
<b>GRI 300 ENVIRONMENTAL STANDARDS</b>				
<b>Effluents and Waste</b>	306	Management Approach		
	306-1	Water discharge by quality and destination		
	306-2	Waste by type and disposal method		
	306-3	Significant spills		
	306-4	Transport of hazardous waste		
	306-5	Water bodies affected by water discharges and/or runoff		
<b>Environmental Compliance</b>	307	Management Approach		
	307-1	Non-compliance with environmental laws and regulations		
<b>Supplier Environmental Assessment</b>	308	Management Approach		
	308-1	New suppliers that were screened using environmental criteria		
	308-2	Negative environmental impacts in the supply chain and actions taken		
<b>GRI 400 SOCIAL STANDARDS</b>				
<b>Employment</b>	401	Management Approach	17 - 18	
	401-1	New employee hires and employee turnover	19	
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	19	
	401-3	Parental leave	19	
<b>Labor/Management Relations</b>	402	Management Approach		
	402-1	Minimum notice periods regarding operational changes		
<b>Occupational Health and Safety</b>	403	Management Approach	17 - 18, 20	
	403-1	Workers representation in formal joint management-worker health and safety committees	20	
	403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	20	
	403-3	Workers with high incidence or high risk of diseases related to their occupation	20	
	403-4	Health and safety topics covered in formal agreements with trade unions		No trade union agreements
<b>Training and Education</b>	404	Management Approach	20 - 21	
	404-1	Average hours of training per year per employee	21	
	404-2	Programs for upgrading employee skills and transition assistance programs	21	
	404-3	Percentage of employees receiving regular performance and career development reviews	21	
<b>Diversity and Equal Opportunity</b>	405	Management Approach	19, 23	
	405-1	Diversity of governance bodies and employees	23	
	405-2	Ratio of basic salary and remuneration of women to men	23	
<b>Non-Discrimination</b>	406	Management Approach	19, 23-24	
	406-1	Incidents of discrimination and corrective actions taken	24	
<b>Freedom of Association and Collective Bargaining</b>	407	Management Approach		
	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		
<b>Child Labor</b>	408	Management Approach	18, 24	
	408-1	Operations and suppliers at significant risk for incidents of child labor	24	
<b>Forced or Compulsory Labor</b>	409	Management Approach	18, 24	
	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	24	
<b>Security Practices</b>	410	Management Approach		
	410-1	Security personnel trained in human rights policies or procedures		
<b>Rights of Indigenous People</b>	411	Management Approach		
	411-1	Incidents of violations involving rights of indigenous peoples		

GRI STANDARD 2016	STANDARD	DESCRIPTION	PAGE	COMMENT
Human Rights Assessment	412	Management Approach	18, 25	
	412-1	Operations that have been subject to human rights reviews or impact assessments	25	
	412-2	Employee training on human rights policies or procedures	25	
	412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	25	
Local Communities	413	Management Approach		
	413-1	Operations with local community engagement, impact assessments, and development programs		
	413-2	Operations with significant actual and potential negative impacts on local communities		
Supplier Social Assessment	414	Management Approach	18, 25 - 26	
	414-1	New suppliers that were screened using social criteria	26	
	414-2	Negative social impacts in the supply chain and actions taken	26	
Public Policy	415	Management Approach		
	415-1	Political contributions		
Customer Health and Safety	416	Management Approach	27 - 29	
	416-1	Assessment of the health and safety impacts of product and service categories	29	
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	29	
Marketing and Labeling	417	Management Approach	27 - 29	
	417-1	Requirements for product and service information and labeling	29	
	417-2	Incidents of non-compliance concerning product and service information and labeling	29	
	417-3	Incidents of non-compliance concerning marketing communications	29	
Customer Privacy	418	Management Approach	30	
	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	30	
Socioeconomic Compliance	419	Management Approach		
	419-1	Non-compliance with laws and regulations in the social and economic area		



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