



Aiming for Nothing.

Lawton Communications Group:
Environmental & Sustainability Policy

LAWTON
COMMUNICATIONS GROUP

dragonfish

fivebyfive®

A carbon neutral company by 2030.

Lawton Communications Group, as well as our individual subsidiary businesses Five by Five and dragonfish consulting, are committed to improving our environmental performance and ensuring we are truly sustainable businesses.

To achieve that, we first recognise that we undertake a variety of activities which may have an effect on the environment.

The average annual operational carbon footprint of someone in a UK advertising agency, also comparable with other professional services, is 3.4 tonnes CO₂e. Although this is much lower than other industries, our people, clients and other stakeholders still expect us to minimise the impact we have and we want to do everything we can to be a responsible group of businesses.

¹ <https://adassoc.org.uk/ad-net-zero>

Our environmental and sustainability vision is to be carbon neutral by 2030.



In addition, we aim to use our position in our respective sectors to encourage those we work with to drive sustainable consumption and take action in their own industries.

We are committed to incorporating the Ad Net Zero¹ actions into our environmental policy and approach, as well as utilising independent and external bodies to audit our performance and drive future improvements.



**We are currently
EcoVadis accredited
and hold a GOLD medal.**

Further details of our EcoVadis accreditation and score can be found in appendix 1 at the end of this document.

Our Environmental and Sustainability Principles.

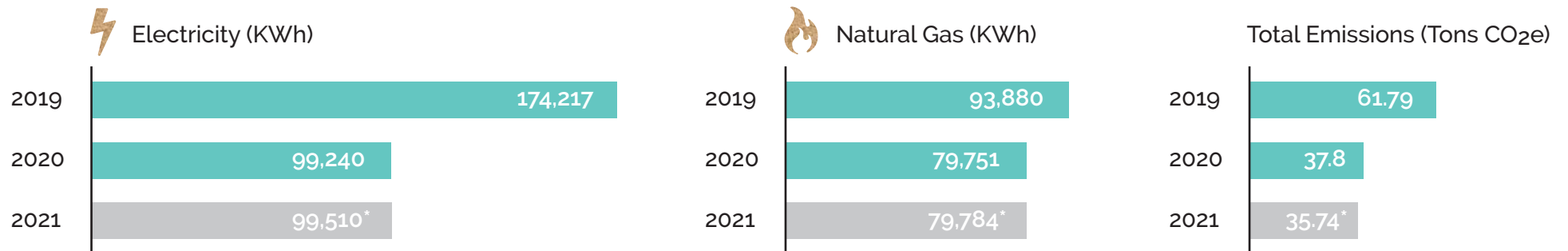
- Comply with all relevant environmental legislation/regulation.
- Promote environmental responsibility within the organisation and ensure our environmental and sustainability policy is implemented at all levels of the group.
- Seek to minimise our production of waste and apply recycle and re-use methods to the waste that is produced.
- Promote energy efficiency throughout the business and where possible, ensure the energy we use is from sustainable sources.
- Promote a culture of responsibility and innovation amongst colleagues to develop new ideas and initiatives to improve our environmental and sustainability performance.
- Encourage involvement in and support local, national and industry-specific environmental and sustainability initiatives and schemes.
- Undertake periodic and rigorous reviews of our progress.



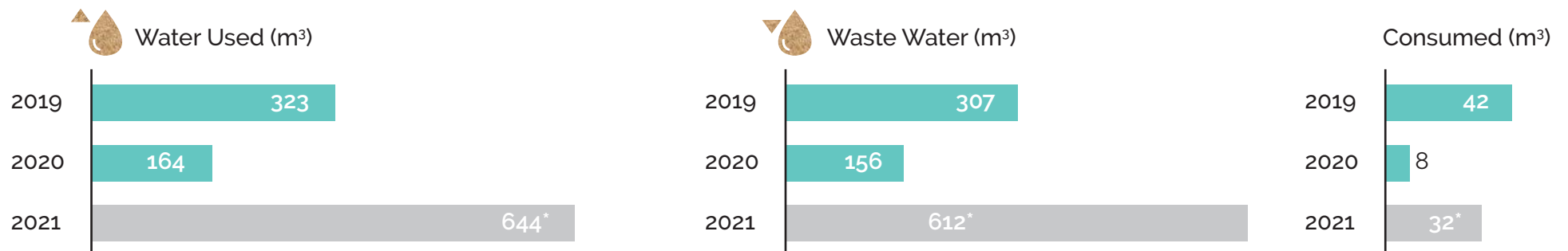
Environmental and Sustainability Plan: **Actions and Targets.**

Action and Targets: Current Data

Our energy usage over the last 3 years:



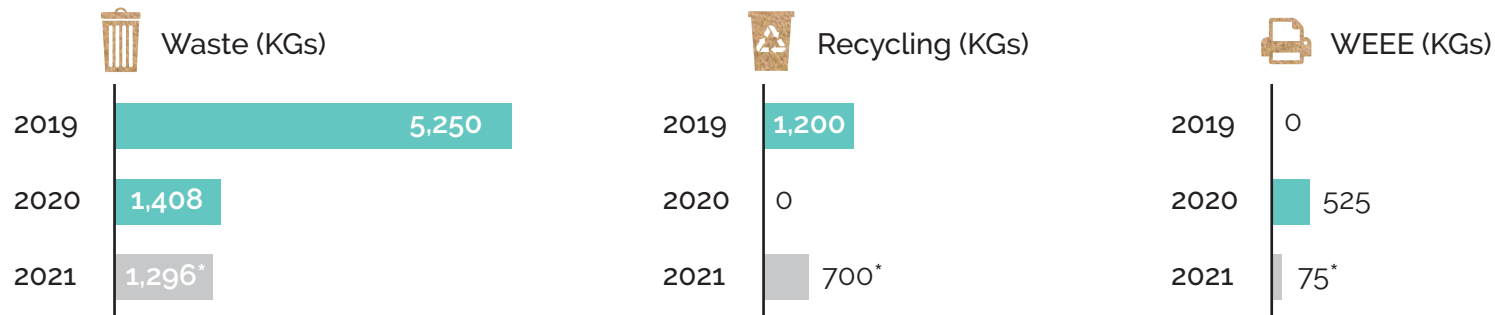
Our water usage over the last 3 years:



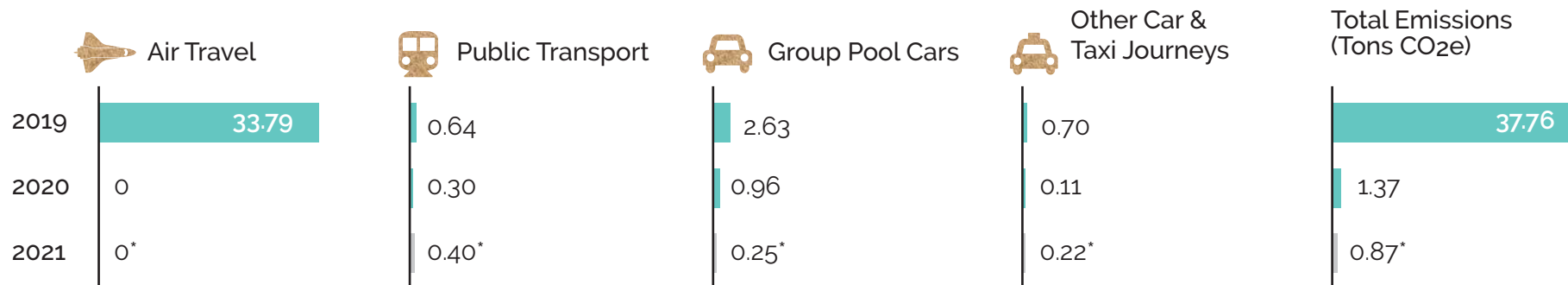
*Expected results for 2021 based on half year figures and calculated prediction data.

Action and Targets: Current Data

Our waste over the last 3 years:



Our travel over the last 3 years:



*Expected results for 2021 based on half year figures and calculated prediction data.

Area 1:

Business Operations.

By measuring our carbon footprint data we have been able to establish our emissions sources and identify ways of reducing them, as far as possible.

Business Travel.

Having implemented a truly flexible way of working, colleagues' requirement to travel to and from office locations is vastly reduced, thus removing emissions from many personal commuting journeys.

A travel loan scheme has been put in place to encourage use of rail/bus over car travel, as well as a contributory cycle to work scheme (which includes electric bikes).

Pool cars are available for both offices to encourage car sharing when visiting client sites and replacement with electric pool cars is currently being investigated. The collection and recording of travel data has been less precise and specific as we would like which means our current data set is based on some assumptions. In order to ensure accurate data going forward, validation checks have been implemented for all travel expense claims to ensure full journey data is captured.

Although air travel is not generally a frequent method of travel, we have identified 2019 as a particularly high flight year. A significant board meeting was undertaken in Australia which accounts for the major proportion of this travel. We also recognise the impact of any air travel is significant and have implemented a rigorous validation process for proposed air travel to ensure that it is necessary. This includes considering the use of video conferencing or, where in person meetings are required, if colleagues in one of our US or Australian offices could attend some meetings, if this would reduce the distance travelled.

Investments in video conferencing facilities have been made to support the continuation of this mode of meeting, even as we come out of the pandemic.



Energy.

Energy, specifically electricity, accounts for the majority of our businesses emissions.

Our current provider sources 76% of fuel from renewable sources, with the remaining 24% from nuclear.

We are committed to improving this and are currently undertaking a market review to move to a provider who can guarantee 100% renewable energy when our current contract ends next year (2022).



Sustainable Supplies.

Whilst we cannot remove all consumption from our business, we do have initiatives in place to reduce the impact and undertake audits to look at additional methods of improving in this area, particularly when it comes to single-use plastics.

These initiatives include:

- Switching to milk in glass bottles to remove approximately 60kg of plastic per year (based on 42g plastic per 2 pint bottle).
- Soft drinks and bottled water provided in glass bottles or cans, rather than plastic.
- Upgraded water filters installed on all kitchen taps to encourage reduction of bottled drinks being consumed.
- All tea and coffee is bought in bulk and provided in reusable containers to prevent excessive single use plastics/materials.
- Paper for printing is Canon Top Colour Paper¹, this paper is FSC accredited and bought directly from Canon who have obtained a gold EcoVadis sustainability accreditation.
- Frequently bought stationery, such as notepads and pens, are sourced from a sustainable provider.²
- Our pens are made from 100% recycled PET bottles, notebooks are 95% recycled materials and are PEFC accredited, post-it notes are made from 100% recycled paper and our flip chart rolls are reusable and recyclable.

1. <https://www.canon.co.uk/sustainability>

2. The Green Office, part of DEOS Group.

<https://www.thegreenoffice.co.uk/our-commitment-to-creating-a-greener-business>

<https://www.thegreenoffice.co.uk/environmental-and-csr-policy>



Recycling.

Throughout the business, opportunities for recycling are in place and are continually reviewed to find improvements.

These initiatives include:

- Recycling stations are established in kitchens to sort and recycle plastics, tins, paper/cardboard and glass.
- Paper recycling bins are in place in all offices.
- Removal of under-desk bins to encourage use of central recycling stations.
- All printer cartridges (22 between 2019-2021) are recycled through Clover Imaging Group¹. In 2020 Clover saved 24,835,893 empty cartridges and parts from landfill and have reforestation schemes in place to offset printing.
- IT equipment at the end of its life (7,100kg between 2017- 2021) is recycled through a local professional and ethical IT recycling company who operate as a charity to support homelessness.²



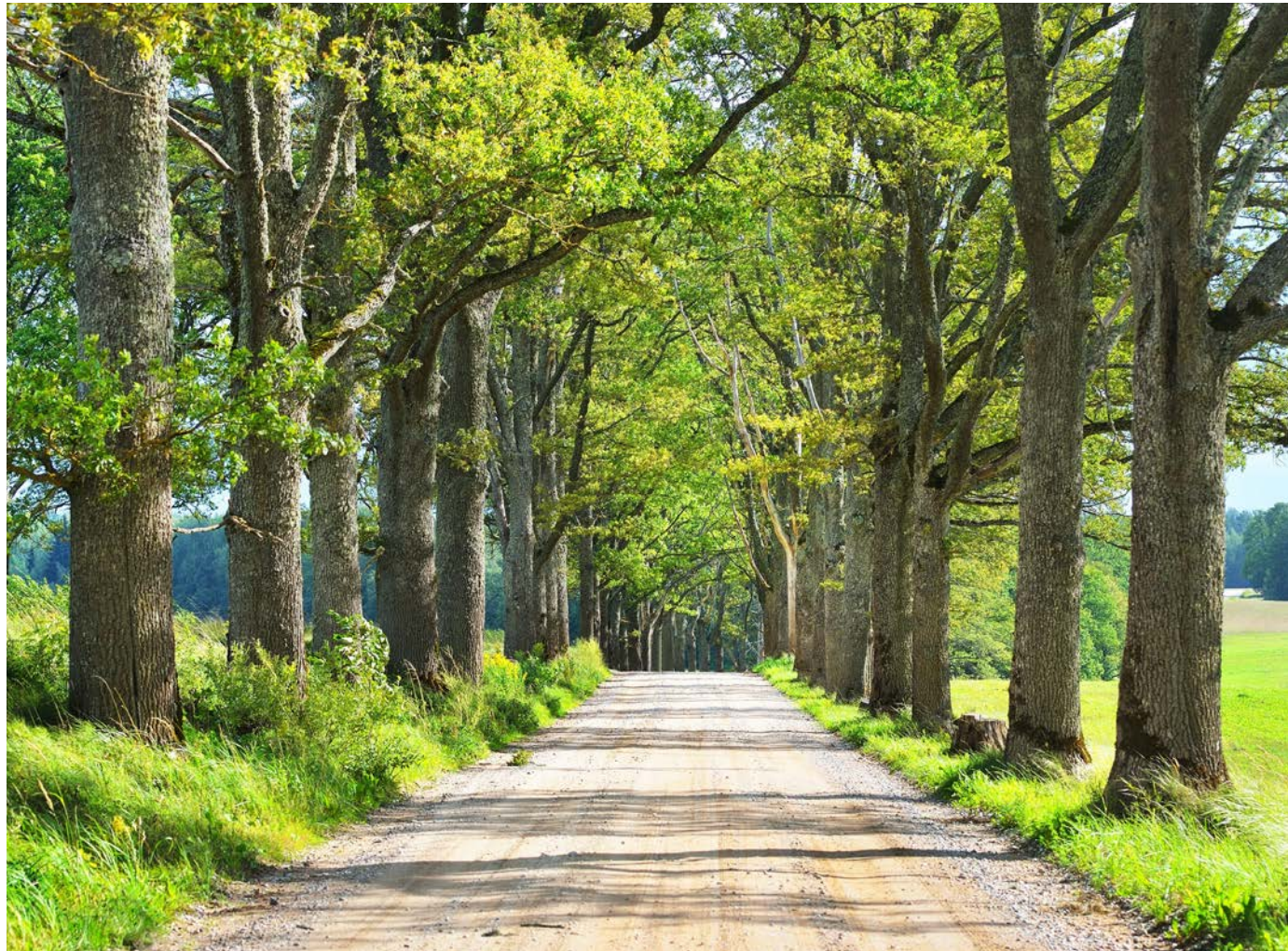
1. https://www.cloverimaging.com/sustainability_report

2. <https://jamies.org.uk/about-us>

Carbon Sequestering.

Our aim is to reduce our emissions as much as possible but we also recognise that there may be some that we are unable to prevent. Therefore, with effect from 2022, each year we will identify carbon emissions that currently cannot be removed from our business operations and will use high quality offsets to support our journey to be carbon neutral by 2030.

We are particularly interested in ensuring the schemes we use and support are verifiable and transparent in their practices and have therefore adopted The Oxford Principles for New Zero Aligned Carbon Offsetting.¹



1. <https://www.smithschool.ox.ac.uk/publications/reports/Oxford-Offsetting-Principles-2020.pdf>

Area 2:

Advertising Production.

Carbon Calculations.

We plan to utilise AdGreen's carbon calculator¹ to establish the carbon cost of our production work. The tool will allow for the measurement of any stills, motion or audio project which is part of an advertising campaign.

Information will be recorded in four key areas: transport, spaces (encompassing non-filming spaces such as offices, locations and studios, and accommodation), materials (such as food, set build and decoration items, batteries and costume), and disposal of waste.

Once we have collected data surrounding our production work, our subsequent action plan will be to assess where reductions can be made, including working directly with clients and suppliers to educate and make proactive suggestions on where carbon savings can be made.

Where carbon cannot be removed or reduced, we will explore proactively budgets to offset using Albert's Creative Offsets Scheme.²



1. <https://weareadgreen.org/carbon-calculator>

2. <https://wearealbert.org/creative-offsets>

Production Suppliers.

The suppliers we use also play a significant role in the overall impact of our production work.

As we develop a broader picture of the impact of our work, through AdGreen's carbon calculator¹ when it's released, the significance of the types or suppliers and choices made will be more readily identifiable.

From 2022, we aim to have a set of criteria in place which we can assess potential suppliers against to ensure they not only hold the same principles as us regarding the environment and sustainability, but they have clear actions in place to reduce and mitigate the impact of their activities.



1. <https://weareadgreen.org/carbon-calculator>

Education.

Educating ourselves is one of the best ways we can make a difference.

Collecting and understanding data for our business will give us the information required to make informed decisions about our environmental impact. In addition, educating our workforce on the impact they can have in their role is a powerful way to ensure everyone in our business is aligned behind our environmental and sustainability vision and principles.

Utilising AdGreen's¹ and #ChangeTheBrief's² industry education resources, we aim for all colleagues to have completed either Sustainable Production Training, Sustainable Production Familiarisation training or the Alliance training programme by July 2022.

In addition, from 2022 we will be incorporating specific environmental and sustainability targets throughout our Performance and Development Review (PDR) process to ensure accountability at all levels.



1. <https://weareadgreen.org/training>

2. <https://www.changethebrief.org>

Strategic Approach.

Our strategic approach for the reduction of carbon in advertising production is summarised below:

Awareness & Education

Raise awareness throughout the agency on the environmental impact of advertising and campaign production.

Education is the foundation and all colleagues will undertake training through AdGreen and/or #ChangeTheBrief. ►

Data Collection

Use measurement tools to collect data on the current carbon impact of our advertising production work.

Tracking our current impact provides a benchmark for continuous improvement. ►

Audit

Auditing our data and current processes, procedures and practices regarding advertising production, will allow us to establish the areas with the highest carbon cost. ►

Action

Using the audit results a series of target-based actions will be implemented to make positive improvements to the carbon footprint of our advertising production methods. ►

Continuous Review

Regular and rigorous reviews of progress will be undertaken, to ensure we are finding opportunities to improve and further reduce the impact of our work.

Further areas of focus.

Championing change in Media Planning & Buying.

It is our view that clients and media agencies collaboratively have the most power to reduce the carbon impact of their operations. Although our business is not directly involved in the planning or purchasing of media, we recognise that we are an integral part of the media supply chain as we produce the assets ultimately used by media agencies.

Our contribution in this area is to use the influence we do have to educate and lobby the media agencies we work with to adopt the IPA Media Futures Group's Climate Charter¹ which will provide the support and resources required for a zero-carbon future.

We will also ask our clients to consider their choice of media agency carefully and will recommend those we know are making positive changes and who have adopted the Climate Charter.

In addition, we hope to be able to use the DIMPACT² tool when it is released to better understand the carbon impact of our digital work.

1. <https://ipamediaclimatecharter.co.uk>

2. <https://dimpact.org/about>



Championing change in consumer behaviour.

In line with Ad Net Zero's¹ fifth action, we're investigating ways to put Climate Action at the heart of our work to help change consumer behaviour.

We have joined the #ChangeTheBrief² alliance which is a partnership between agencies of every size and type – media, creative, design, PR – and their clients, learning and acting together to directly address the challenge of the climate crisis by promoting sustainability via every channel available to them.

Part of this strategy is to actively seek out opportunities to work with clients who are working in the sustainability space or operating in sustainable ways.

For example, our Australian office is working with FutureFeed³ who exists to support the growth of the use of Asparagopsis as a natural ingredient for livestock to significantly reduce carbon emissions.



1. <https://adassoc.org.uk/ad-net-zero>

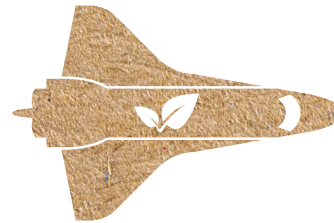
2. <https://www.changethebrief.org>

3. <https://www.future-feed.com>

Awards & events.

Awards and events are a significant part of the advertising culture, however they can have a huge impact on the carbon emissions generated by our industry.

We do not generally attend overseas events and see this is a huge factor in our below-average carbon footprint from travel. We will continue to critically assess whether attending overseas events or award ceremonies is viable and where attendance does occur, previously mentioned offsetting schemes will be utilised.



Aiming for Nothing: Our Commitment.

Lawton Communications Group, Five by Five and dragonfish consulting are individually and collectively committed to measuring and reducing our carbon footprint in order to be net zero by 2030. We recognise this is an investment in our business and planet's future and are willing to make the necessary adjustments in order to fulfil our environmental and sustainability vision.


Signed by Leadership Teams



Nick Lawton, Group Chairman
Lawton Communications Group



Mark Denton, Group Finance Director
Lawton Communications Group



Katie Whittam-Hayes, Group HR Director
Lawton Communications Group



George Roberts, Client Services Director
Five by Five



Linda Pengelly, Operations Director
Five by Five



Ravi Beeharry, Creative Director
Five by Five



Andy Mancuso, Creative Director
Five by Five



Niall Cluley, Managing Director
Dragonfish



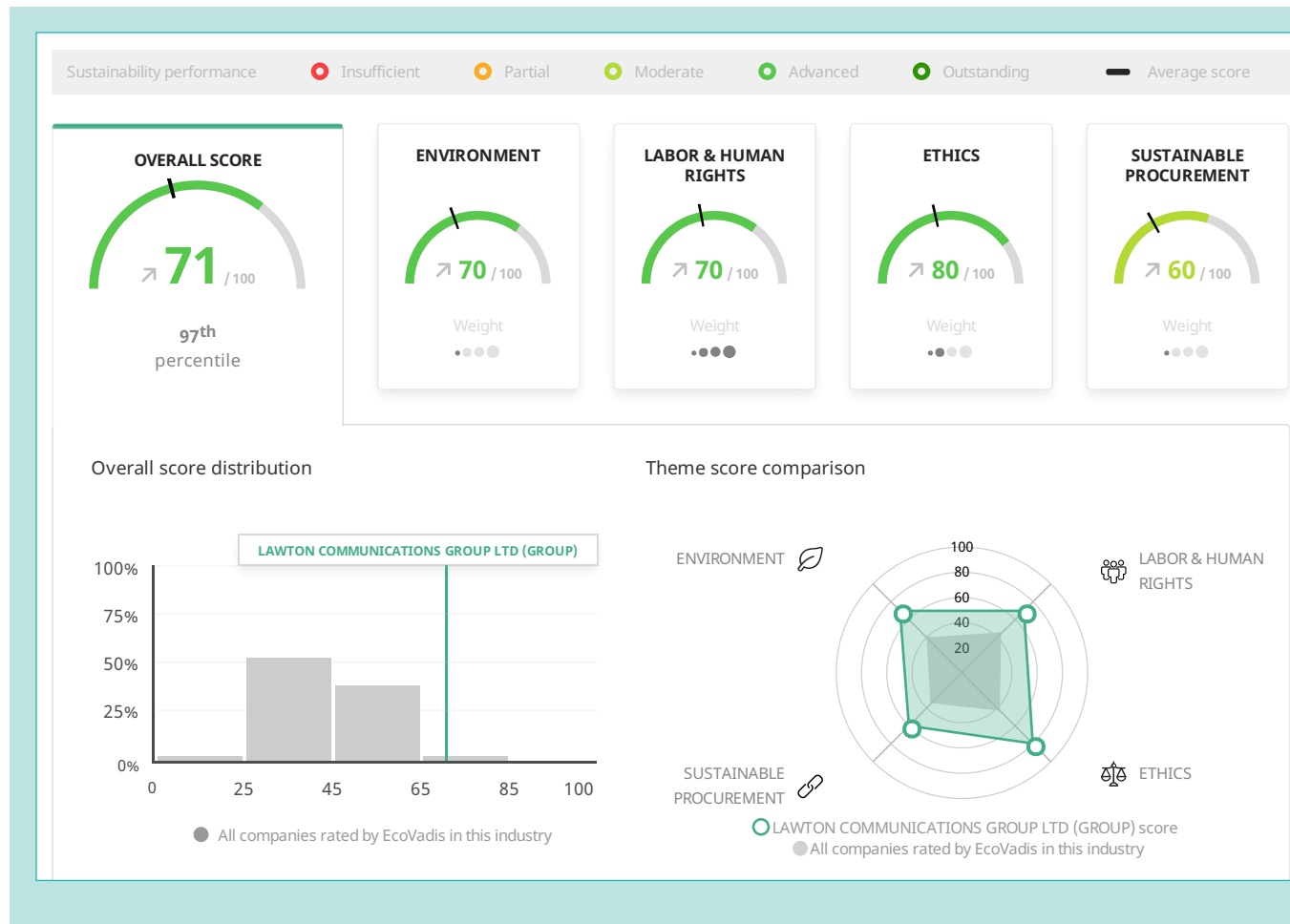
Ed Lynam, Client Success & Relationship Director
Dragonfish



Andree Gowar, Strategy & Research Director
Dragonfish

Appendix 1: Ecovadis standard and scorecard summary.

Overall score summary



Appendix 1 [continued]: Ecovadis standard and scorecard summary.

Environment

Strengths

Environment	Weight
Strengths (10)	
Policies	
Strengths	
Standard policy on a majority of environmental issues	
Actions	
Strengths	
Purchase and/or generation of renewable energy	
Energy and/or carbon audit	
Training/programs to raise employees' or engineers' awareness regarding project's environmental impact	
Measures implemented to recycle toners & ink cartridges	
Measures to recycle paper/carton waste	
Measures to recycle IT equipment	
Results	
Strengths	
Reporting on total weight of waste	
Reporting on total energy consumption	
Standard reporting on environmental issues	

Improvement areas

Environment	Weight
Improvement Areas (2)	
Policies	
Priority	Improvement Areas
Medium	No information on endorsement of external sustainability initiatives or principles
Medium	Inconclusive documentation for environmental policies on some relevant issues (i.e. environmental services & advocacy)

Appendix 1 [continued]: Ecovadis standard and scorecard summary.

Labour and Human Rights

Strengths

Labor & Human Rights	
Strengths (20)	
Policies	
Strengths	
Standard policy on a majority of labor or human rights issues	
Actions	
Strengths	
Measures to promote gender and/or minority inclusion in the workplace	
Compensation for extra or atypical working hours	
Additional leave beyond standard vacation days	
Employee satisfaction survey	
Bonus scheme related to company performance	
Flexible organization of work available to employees (e.g. remote work, flexitime)	
Health care coverage of employees in place	
Whistleblower procedure on discrimination and harassment	
Measures to promote wage equality in the workplace	
Specific measures on discrimination issues	
Employee health & safety detailed risk assessment	
Measures to prevent discrimination during recruitment phase	
Regular assessment (at least once a year) of individual performance	
Active preventive measures for stress	
Active preventive measures for Repetitive Strain Injury (RSI)	
Provision of skills development training	
Specific measures implemented for the integration of employees with disabilities	
Setting of individual career plan for all employees	
Training of relevant employees on health & safety risks and best working practices	

Improvement areas

Labor & Human Rights	
Improvement Areas (4)	
Policies	
Priority	Improvement Areas
Medium	No information on endorsement of external sustainability initiatives or principles
Medium	Inconclusive documentation for labor and human rights policies on some relevant issues (i.e. working conditions)
Results	
Priority	Improvement Areas
High	Reporting available on labor and human rights issues, but some material topics are not covered
Low	No information related to reporting on average training hours per employee


Appendix 1 [continued]: Ecovadis standard and scorecard summary.

Ethics + Sustainable Procurement

Strengths

Ethics		Weight
Strengths (12)		
Policies		
Strengths		
Disciplinary sanctions to deal with policy violations		
Employee signature acknowledgement of ethics policies		
Dedicated responsibility for ethics issues		
Comprehensive policies on ethics issues		
Actions		
Strengths		
Incident response procedure (IRP) to manage breaches of confidential information		
Whistleblower procedure to report ethics issues		
Implementation of a records retention schedule		
Audits of control procedures to prevent information security breaches		
Awareness training to prevent information security breaches		
Measures to protect third party data from unauthorized access or disclosure		
Measures for gaining stakeholder consent regarding the processing, sharing and retention of confidential information		
Results		
Strengths		
Standard reporting on ethics issues		
Sustainable Procurement		Weight
Strengths (5)		
Policies		
Strengths		
Sustainable procurement policies on supplier environmental practices		
Actions		
Strengths		
Internal purchasing processes for data hosting services integrate sustainability		
Internal purchasing processes for wood or wood-based products integrate sustainability		
Internal purchasing processes for stationery and related items (e.g. pens, pencils) integrate sustainability		
Supplier sustainability code of conduct in place		

Improvement areas



Ethics

Weight

Improvement Areas (3)

Policies

Priority

Improvement Areas

Medium

No information on endorsement of external sustainability initiatives or principles

Actions

Priority


Improvement Areas

High

No supporting documentation regarding an ethics due diligence program on third parties

Medium

No supporting documentation regarding awareness trainings on corruption



Sustainable Procurement

Weight

Improvement Areas (3)

Policies

Priority

Improvement Areas

Medium

Inconclusive documentation for policies on supplier social practices

Actions

Priority

Improvement Areas

High

No information on social or environmental clauses being included in supplier contracts

High

No information on sustainability risk analysis being conducted (i.e. prior to supplier assessments or audits)

Medium

No information on assessments of suppliers on sustainability issues

Appendix 1 [continued]:

Ecovadis rating certificate.



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