

# CORPORATE & SOCIAL RESPONSIBILITY

Bubble is committed to operating in a responsible and sustainable way to deliver tangible benefits for our staff, our clients, our venues and the environment.

We are committed to continuously improving our CSR sustainability initiatives and have employed agency ISLA to review our internal policies for 2022 and moving forward, audit the business and recommend additional ways we can be even more proactive on our sustainable processes.

Our conscientious approach is carried throughout all elements of our service, from the personal serviced provided to clients during the enquiry and event planning stages through to our responsible mind set in terms of careful portion control to minimise waste and post-event recycling activity.

Our Corporate & Social Responsibility (CSR) is a key driver for the way we approach our business. It helps us to apply our vision, principles and values to our daily operations and activities. It also guides our efforts to improve the impacts that we have on the wider community and the environment. It enhances our commitment to follow the best business practices and supports our long-term sustainability. Our CSR Policy helps us to identify actions that we can take to serve the interests of wider society that also make us a better, more competitive business.

All of our employees are engaged with our CSR approach and our management understands the importance of ethical leadership for the performance of the business.

Our senior management team are responsible for CSR throughout the company, while individual managers have responsibility for CSR in their specific work areas.

Our CSR approach is structured around five key areas (which are outlined further in the next two pages):

- People – ensuring that we have a diverse workforce where our people have a safe, ethical and fair place to work and reach their full potential
- Environment – improving our environmental performance and resource efficiency
- Responsible sourcing – purchasing from ethical, sustainable and, as much as possible, local food sources
- Diverse & healthy food offer – offering a wide range of nutritional and global menus with special dietary options.
- Giving back – supporting charitable causes directly and through our new ‘buy one, give one’ initiative

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## People

People – ensuring that we have a diverse workforce where our people have a safe, ethical and fair place to work and reach their full potential.

- We are 100% committed to ensuring the well-being of every employee in our workforce, and recognise the importance of family and personal commitments
- Bubble is passionate about equal opportunities and maintains a strict non-discrimination policy, whether due to gender, race, sexual orientation, disability, or religion or belief (or lack of), age (actual or perceived) race or colour. We offer a high level of support to our multi-cultural and diverse team
- We provide a clean, healthy and safe working environment in line with our Health and Safety policy and safe systems of work
- The wellbeing and motivation of staff is key to the ongoing success of Bubble, and we provide nutritious and energising staff meals
- We pay all staff above the London Living Wage as we see this as a responsible approach that allows everyone in our team to sustain themselves, enjoy a decent quality of life and create a strong team.
- We provide opportunities for staff to take up pension and childcare voucher schemes
- We regularly hold team meetings to ensure our staff are kept abreast of latest developments and undertake an annual staff appraisal process alongside regular performance monitoring at an individual level

- We regularly organise team-building activities and social events including trips abroad, evening events (which often involve food research by visiting restaurants and street food markets) and team sports days

- We ensure that all staff receive appropriate training and are suitably equipped to undertake their roles in a safe and efficient manner at all times

## Environment

- Bubble remains committed to reducing energy consumption, minimising waste and water consumption. We do not waste food where we can avoid it and we never order more than we know we need. This is communicated to our clients and where possible we encourage them to consider food sourcing and waste in their menu choice. We actively manage the kitchen's output to reduce waste at every opportunity.

- Bubble operates a recycling policy, which includes cooking oil, and wherever possible this is enforced on location and in line with local government guidelines. We have contracts with a waste oil company who collect and then turn old oil into other uses, and similarly we employ a specialist waste disposal company who collect any waste food and either recycle this to become bio-fuel

- Bubble has significantly reduced its reliance on non-environmentally friendly cleaning materials. We have changed suppliers and carried out education to ensure that staff are aware of the environmental impact of different chemicals.

- Wherever possible, Bubble utilizes environmentally friendly cleaning products

- Bubble actively encourages clients to avoid ordering bottled water and using tap water filtered tap water at events. Should a client wish to have bottled water, we have a contract with a company that produces carbon-neutral and ethically sourced bottled water, using a dedicated filtration system, with all profits going to WaterAid.

- If single use service wear is required it will be 100% biodegradable and has been confirmed by the supplier as OK to put into food waste bins.

- Bubble is continuing to reduce its carbon footprint as much as possible and carefully plans all deliveries and collections to minimise journeys and fuel consumption. Additionally we have electric vehicles in our fleet which are utilised as often as possible for events and meetings. Whenever possible, we also walk, cycle or use public transport to get to meetings. This all contributes to our work towards safeguarding air quality. In addition we contribute to local charities that are involved in promoting air quality in London.

- Bubble is fully committed to health and wellbeing of our staff. As well as offering additional medical support through a third party provider, we also encourage staff to cycle to work and use the Cycle to Work Scheme. In the past few years, we have created a dedicated cycle storage facility and built showers and changing rooms for staff use.

- All our suppliers are accredited and we require them to complete a form to state their environmental performance at the commencement of the contract, which is reviewed on an annual basis

- Although the points listed above provide clear evidence that we promote the circular economy, we have also trained staff to consider the 3 keys steps in order to build on this work:

- Bubble considers waste and pollution as design flaws rather than inevitable by-products of functioning as a events catering company. We look to harness new materials and technology, to minimise waste in the first place.



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- Although adhering to strict Health and Safety regulations limits the way that we can keep products like food or packaging ‘in circulation’, we have adopted a number of methods to minimize anything going to landfill.
- There’s no concept of waste in nature. Everything is food for something else – a leaf that falls from the tree feeds the forest. By returning nutrients to the soil through our recycling policy, we can enhance natural resources.

## Responsible Sourcing

- We source local, seasonal produce wherever possible and support independent producers who champion heritage varieties of fruit, veg and livestock. We enjoy a strong sense of local community and firmly believe in the practice of good neighbours
- We ensure that all meat, poultry, game, fish and seafood are sourced from livestock production systems that comply with national regulatory standards and the international standards being developed by the World Organisation for Animal Health
- We insist on using Fairtrade products wherever this is feasible, this includes our range of coffees, teas, juices and certain fruits
- Bubble minimises energy use, partly through our ways of working, but also by considering age and efficiency of our equipment. We have invested in significant CAPEX to ensure that our commercial kitchen has modern, energy efficient equipment. We had a contract with an energy company who focused on the provision of renewable energy, but frustratingly, they went into administration due to the significant increases in costs incurred. We are in the process of actively seeking a new provider that can offer a similarly renewable energy package.

- We are signed up to the Choose Cage-Free Pledge and only use free-range eggs (and, on request, free-range poultry/meat) in our kitchens and have done so for many years
- As part of our commitment to purchasing stock from sustainable sources we have signed up to the Sustainable Fish City Pledge and our seafood comes from sustainable sources and is as local as geographically possible.
- Our suppliers work with the Marine Conservation Society, London Food Link, London Fish City, and the Marine Stewardship Council
- We encourage clients to select the most sustainable meat and fish options for their events
- Venue permitting, we encourage clients to opt for tap water for events, otherwise we provide Belu water – produced by an award-winning social enterprise that uses all profits to fund clean water projects through WaterAid
- We have introduced Harry Spector’s chocolate truffles for events. The company is a social enterprise which supports and educates young adults with autism to create artisan chocolates
- We offer Toast lager which sources the heel end of loaves that aren’t used to make sandwiches for production. This eliminates food waste and finding an alternative for food that may not have been eaten.
- We offer Belu water which is an asset locked Social Enterprise so profits or sale of their business can only benefit those in water poverty.

## Diverse and Healthy Food Offer

- We insist on using fresh, seasonal produce rather than processed or pre-packed frozen foods.
- We offer organic as an option on almost all of our menu dishes.

- We always offer vegetarian, vegan and special dietary alternatives (i.e. allergies, cultural/religious options)
- We ensure that foods offered to consumers are prepared with the minimum amount of additives, including salt and sugar, provide full nutritional information for the consumer on dish content
- We have put in place rigorous measures in order to comply fully with allergen information provision under the EU Food Information for Consumers Regulation legislation which came into law in 2014
- We can provide appropriate menu information and food offerings to consumers so that they can make choices based on food provenance and sustainability

## Giving Back

- Our partnership with social enterprise restaurant, Brigade, enables us to work on selected events with their team of apprentice chefs (who have been affected by homelessness)
- Bubble offers a substantial discount for charitable events on a frequent basis and provides regular support by delivering events at minimal or no cost for nominated charities such as the Teenage Cancer Trust, Terence Higgins Trust and NSPCC
- Our newest initiative is whereby for every event confirmed with Bubble, we give a gift to a charitable cause. Examples include providing funding to educate a child in Bali for a year, providing clean water to schools and orphanages in Kenya or sponsoring rural study or youth development centres in India and South Africa. Once an event is confirmed, the client receives a personal letter of thanks from our MD which includes details of the individual gift given as a result of their business. This ‘feel good’ initiative enables the company and our clients to make a positive impact



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## Modern Slavery and Human Trafficking Policy

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives, and business partners.

1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time

## Responsibility for the policy

2.1 Bubble's management board has overall responsibility for ensuring this policy complies with any legal and ethical obligations, and that all those under our control comply with it.

2.2 The operations team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your line manager.

## Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy in the staff handbook as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at on the Intranet.

## Communication and awareness of this policy

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter

## Breaches of this policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with organisations or individuals working on our behalf if they breach this policy.



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## WHISTLEBLOWING POLICY

11.1 We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

11.2 The aims of this policy are:

- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide staff with guidance as to how to raise those concerns.
- (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

What is whistleblowing?

11.3 "Whistleblowing" is the disclosure of information which relates to suspected wrong doing

or dangers at work. This may include:

- (a) criminal activity;
- (b) miscarriages of justice;
- (c) danger to health and safety;
- (d) damage to the environment;
- (e) failure to comply with any legal or professional obligation or regulatory requirements;
- (f) financial fraud or mismanagement;
- (g) negligence;

(h) breach of our internal policies and procedures;

- (i) conduct likely to damage our reputation;
- (j) unauthorised disclosure of confidential information;
- (k) the deliberate concealment of any of the above matters.

11.4 A "whistleblower" is a person who raises a genuine concern relating to any of the above.

If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a "whistleblowing concern") you should report it under this policy.

11.5 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

11.6 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer.

### Raising a whistleblowing concern

11.7 We hope that in many cases you will be able to raise any concerns with your Line Manager.

You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

11.8 However, where the matter is more serious, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact a Director.

11.9 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or an accredited trade union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

11.10 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

### Confidentiality

11.11 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

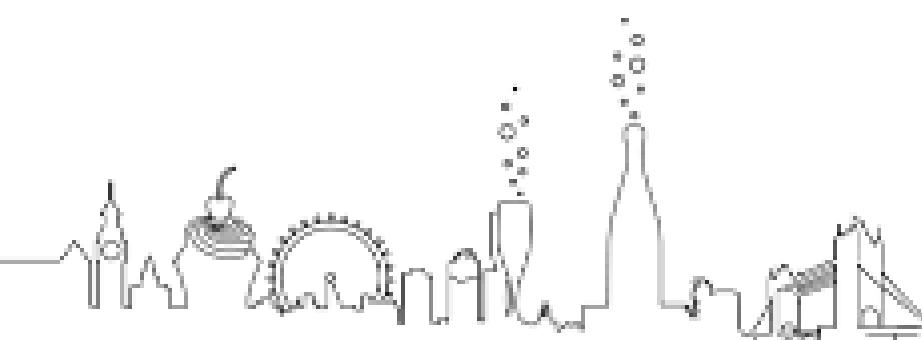
11.12 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the

Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

### External disclosures

11.13 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

11.14 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.



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## WHISTLEBLOWING POLICY CONT

11.15 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your Line Manager or a Director.

### Investigation and outcome

11.16 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

11.17 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

11.18 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

11.19 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.  
If you are not satisfied

11.20 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

### Protection and support for whistleblowers

11.21 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

11.22 Staff must not suffer any detrimental treatment as a result of raising a concern. Detimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied,

you should raise it formally using our Grievance Procedure.

11.23 Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

### Responsibility for the success of this policy

11.24 The Directors have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

11.25 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

Public Concern at Work  
(Independent whistleblowing charity)  
Helpline: (020) 7404 6609

E-mail: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
Website: [www.pcaw.co.uk](http://www.pcaw.co.uk)

