

Communication on Progress 2011



The Global Compact Communication on Progress

| | |
|---|----------|
| Control Risks and the Global Impact | 1 |
| CEO's statement of Control Risks' continued support for the Global Compact | 1 |
| Human Rights | 2 |
| Commitment | 2 |
| Systems | 2 |
| Activities | 3 |
| Plans for 2011-2012 | 3 |
| Labour | 4 |
| Commitment | 4 |
| Systems | 4 |
| Activities | 5 |
| Plans for 2011-12 | 5 |
| Environment | 6 |
| Commitment | 6 |
| Systems | 6 |
| Activities | 7 |
| Plans for 2011-2012 | 7 |
| Anti-corruption | 8 |
| Commitment | 8 |
| Systems | 8 |
| Activities | 9 |
| Plans for 2011-2012 | 9 |

About Control Risks

Control Risks is an independent risk consultancy that helps its clients manage political, security and integrity risks worldwide. With offices in more than 20 countries, we work across the world and operate as one firm, in accordance with shared standards and principles. We employ 2,500 people from highly diverse backgrounds, and we work with clients from the public, private and non-profit sectors. We have worked for more than 5,300 clients across all industry sectors in over 130 countries.

Since Control Risks was formed, in 1975, it has been defined by a commitment to the highest standards of business integrity and ethics. Our four core values underpin all that we do. These are: integrity and ethics, professionalism and excellence, collaboration and teamwork, and commitment to people.

Our mission is to enable our clients to succeed in complex or hostile business environments. Because of the nature of our business, we advise clients in potentially controversial, sometimes dangerous and often morally complex situations. In these circumstances, the task of applying our values is a major commitment, a constant challenge and an essential operating requirement.

We aim to establish long-term relationships with our clients, based on trust, candour and mutual respect. When we decide whether to work with a new client, or to accept a new assignment, we take account of ethical issues, as well as legal compliance. At all times we work to retain the trust and respect of our clients and business partners, as well as the government officials and communities among whom we operate. There are occasions when we cannot support a client for ethical reasons.

Control Risks and the Global Compact

Control Risks is committed to advocating and implementing the UN Global Compact's principles in all our offices, in all aspects of our work, and across our broad spectrum of clients, whether we are working for corporate clients, governments, NGOs or private individuals. As our clients operate in often hostile and complex environments, it is vital that we are able to advise them on best practice and on conducting business responsibly.

Control Risks' core values and the principles of the Global Compact overlap, and our commitment to the Compact provides a natural extension and broad umbrella for our own values. Commitment to our core values is essential in aligning our offices and business units, and is at the heart of what we consider to be the unique spirit of the company. On joining Control Risks, our employees are asked to embrace our values, and our training programmes reinforce what the values mean to us in practice.

Meanwhile, as Control Risks continues to expand, we recognise the associated responsibilities this brings: the need for clear guidelines, effective operating procedures, systematic training and formal management structures. Our Code of Ethics, our Anti-Bribery and Anti-Corruption policy and Human Rights policy are central to the set of policies which underpin all aspects of our work and our internal processes.

CEO's statement of Control Risks' continued support for the Global Compact

I am delighted to reaffirm Control Risks' continuing support for – and commitment to – the UN Global Compact.

This is our third Communication on Progress (COP). As before, our report places particular emphasis on anti-corruption and human rights. These issues are particularly sensitive in the complex environments in which we operate, many of which are affected by conflict. They are also the areas where we think can make the most distinctive contribution to the wider business and international communities.

In the anti-bribery arena, the UK Bribery Act coming into force on 1 July 2011 was the single most important development in the year under review. Taking the Act as a catalyst, we have this year placed an even greater concentration of activities on anti-bribery and anti-corruption, both in assisting our clients and ensuring that our own people are thoroughly briefed on the full implications of the Act and understand how to comply with it.

In the human rights field, we welcome the UN Human Rights Council's endorsement in June 2011 of Professor John Ruggie's Guiding Principles for the Implementation of the United Nations 'Protect, Respect and Remedy' Framework. In our capacity as consultants, the aspects of the Guiding Principles that are of particular relevance relate to the need for company risk assessment and due diligence processes to identify, prevent and mitigate any adverse impact on human rights. We recognise that it is for the private sector itself to build on these principles, and to develop practical procedures and mechanisms to put them into practice. We look forward to playing a full part in this process.

As far as the labour principle is concerned, we have taken further steps to ensure that we are treating our people consistently across all our offices, and providing them with consistent opportunities for career advancement at all levels in all offices.

After an initial period of information-gathering, I am pleased to report that our environmental approach is now gathering momentum across the company with the co-ordinated activities of our regional environmental champions spearheading new initiatives and raising awareness of our environmental priorities in their respective regions.

We look forward to following through on all these initiatives in the year ahead.



Richard Fenning
CEO, Control Risks

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that that they are not complicit in human rights abuses.

Commitment

Control Risks' commitment to the UN Global Compact's principles on human rights is expressed in our *Code of Ethics* which states:

Human Rights. Control Risks supports the Universal Declaration of Human Rights, and our employees are never to be complicit in human rights abuses. We examine all advice to clients for its potential direct and indirect impacts on human rights. Control Risks abides by the Voluntary Principles on Security and Human Rights (VPs).

We elaborate on this commitment in a further policy document, our Human Rights policy. Both the Code of Ethics and the Human Rights policy are available on our external website (www.control-risks.com).

Our Human Rights policy makes specific reference to the Universal Declaration of Human Rights, the VPs, the UN Global Compact, the Montreux Document and the UN Human Rights Council's *Guiding Principles on Business and Human Rights*.

Control Risks has so far been unable to participate in the VPs process as a formal signatory because of our status as consultants. However, we regard the VPs as an essential source of guidance, not only in our work for companies which are already signatories, but also when working with other entities facing similar challenges in conflict-affected areas.

Systems

Training and reference documents

Control Risks includes human rights alongside other aspects of our *Code of Ethics* in all levels of our training from induction to management training.

Since our 2010 COP, we have prepared a new briefing document *Human Rights Essentials: a Briefing for Control Risks Personnel*. This replaces two earlier documents: the *Introduction to Security and Human Rights* and the *Consultant Briefing Guidelines* on the VPs. The new document covers the key human rights concepts and the responsibilities of companies and individuals, as well as the most important international human rights instruments, with a particular focus on the VPs. In line with the Global Compact principles, the briefing includes a particular focus on the need to avoid complicity with human rights abuses committed by others. It uses a set of scenarios to illustrate the kinds of problems a company such as Control Risks may face when working with clients in high risk environments, and gives guidance on how to respond, and where and how to seek assistance.

We have also developed an e-learning course to accompany the *Human Rights Essentials* briefing. All security consultants working in high-risk environments will be required to complete this course, and to take an online test. Performance is monitored through a learning management system, and consultants who fail to achieve a 100% score in the test have to re-take it. If necessary, remedial training will be provided to ensure that relevant consultants fully understand their human rights responsibilities in accordance with the VPs. After piloting the course and the test in August 2011, we started implementing it in September.

Due diligence and risk assessment

In line with the UN Human Rights Council's *Guiding Principles for the Implementation of the United Nations 'Protect, Respect and Remedy' Framework*, we are putting particular emphasis on a review of our human rights due diligence and risk assessment procedures.

In our 2010 COP, we referred to a review of the internal human rights due diligence and risk assessment process we undertake before accepting a new assignment. We are now taking this review a stage further with a focus on the questions that consultants should address once an assignment is under way, particularly in the first six months. Our objective is to refine existing practice, and to make it more systematic.

We apply the same principles and thought processes in our external consultancy, notably in our Global Risk Analysis (GRA) assessments and in our operational security consultancy in high-risk environments and environments affected by conflict. Our activities since our last COP include detailed human rights risk assessments for clients operating in West Africa and South America.

The Ethics Committee

Control Risks' employees are encouraged to refer to the Group Ethics Committee if in doubt about the human rights and other ethical implications of a proposed course of action. Such referrals most often take place when we are deciding whether or not to take on new assignments in sensitive areas. Several times a year, we turn down – or decide not to bid for – potential new assignments on ethical grounds. Human rights considerations are often a key factor in these decisions.

Internal whistleblowing process

Control Risks' employees are able to make an anonymous report if they suspect that a Control Risks' employee is engaged in unacceptable or unethical conduct, in relation to human rights or any other ethical issue, and if they feel unable to raise the issue with their line manager.

Third party complaints

Control Risks has instituted a third parties complaints process, and this is included in a policy document that is required reading for all senior managers. The ethics section of our external website states that external parties who wish to raise ethical concerns may contact Control Risks staff at any of our offices, and also includes a link to the e-mail address of the Group Legal Counsel.

Activities

Promotion of professional standards in the international security industry

Control Risks has long taken a leading position in the development and adoption of security industry standards and codes of practice, and this includes a firm commitment to human rights.

In our 2010 COP, we reported that we had recently joined Aerospace, Defence and Security Group (ADS - www.adsgroup.org.uk), a leading UK-based industry association with some 900 members. Control Risks' Director of Government Support, Chris Sanderson, acts as Chairman of the Security in Complex Environments Group (SCEG), a special interest group within the ADS with particular responsibility for improving the operating standards of UK security companies operating abroad in hostile or hazardous environments.

In June 2011, the UK Foreign and Commonwealth Office (FCO) confirmed the appointment of ADS as its partner in promoting the development, implementation and enforcement of robust standards within the UK Private Military Security Companies (PMSC) industry. Control Risks expects to play a prominent part in this process.

Internationally, Control Risks had earlier contributed to the development of the Montreux Document, which reminded states of their obligations with regard to their engagement with the PMSC industry and its potential impact on human rights. Control Risks went on to make significant contributions to the development of the International Code of Conduct for Private Security Providers (ICOC-PSP www.icoc-psp.org). The ICOC-PSP process was convened by the Swiss government, and Control Risks was one of the first signatories to the Code at its inception in November 2010. Signatories commit themselves to operating "in a manner that recognises and supports the rule of law; respects human rights, and protects the interests of their clients". Control Risks continues to be closely involved with the development of the governance mechanisms for the Code and the extension of the Code to areas such as maritime security.

Plans for 2011-2012

In the year ahead, we plan to:

- Ensure that all security consultants working in high-risk areas take our human rights e-learning course, and pass the online test. Consultants who are deployed in Africa and the Middle East will be the first to take the course; other regions will then follow.
- Following our initial focus on undertaking a human rights risk assessment before taking on an assignment, continue to refine our procedures for deepening the initial risk assessment once a consultant has begun an assignment.
- Contribute to the development of international best practice on human rights due diligence assessments in our own work as consultants.
- Play a prominent role in working internationally and with the UK government on developing standards – including on human rights – within the security industry, as part of our association with the ADS industry group.

Labour

Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Commitment

- Commitment to People is one of Control Risks' four core values. We are committed to providing opportunities for our people to develop, achieve their professional aspirations and enjoy successful and rewarding careers within the company. This commitment is reflected in our human resources policies, systems and activities in place across our offices.
- We respect the rights of employees to form and join trade unions for the protection of individual and collective interests.
- Diversity is a key element of our human resources strategy. Control Risks aims to create an environment that welcomes and respects the different perspectives of all our employees, as well as those of our clients and our suppliers. Control Risks' inclusive "One Firm" culture means that our people feel valued.
- Control Risks recognises that the best ideas come from a diverse pool of knowledge, and values the range of backgrounds, beliefs, gender, age and sexuality that generate such ideas. We understand that open minds lead to mutual respect and ensure openness to change and innovation.
- We are committed to ensuring that our people are consulted of any changes to the business that will have an impact on their employment.

The following statements are extracts from our human resources policies:

- Control Risks is committed to providing a working environment in which respect for people's dignity is at the core of our organisation. Every employee has the right to dignity at work. The company and all its employees are responsible for ensuring a working environment in which everyone is treated with respect and dignity.
- Control Risks' employees have the right to work in an environment of mutual trust and respect, where everyone is fairly treated without discrimination. The policy emphasises the fact that any employee who has taken action against discrimination will not be victimised in any way.
- Control Risks aims to ensure that no employee, job applicant, client or supplier is discriminated against, either directly or indirectly on the grounds of sex, race, colour, nationality, ethnic or racial origins, sexual orientation, age, religious belief, marital status or disability. This policy statement applies to all decisions relating to hiring, employment opportunity and promotion.

Systems

Control Risks complies with local legislation in the countries where it operates. Where our own standards exceed those of local legislation, we will apply our own standards: the issue of forced or compulsory labour, or child labour, therefore does not arise in our own operations. The company vets its subcontractors (as well as all prospective employees) before engaging them, and requires them to abide by its policies when working on the company's behalf.

We have systems in place to ensure that any issues arising, for example, discrimination, bullying or harassment, are dealt with fairly and objectively. These systems are set out in our grievance, and dignity at work policies and processes.

Control Risks constantly strives to improve performance management to ensure that we manage and develop our people consistently and in line with our values.

We set high standards for our people, and we offer structured training and development programmes designed to help employees at all levels meet those standards and achieve their full potential. Training and development take the form of e-learning, residential and non-residential courses, and internal and external workshops.

As with human rights more broadly, Control Risks' people are expected to raise any concerns about our clients' labour practices with the company's Ethics Committee.

Activities

Long-term investment in our people is essential to the continuing success of our business. Control Risks constantly seeks to enhance the learning and development opportunities it provides so that our employees have the skills and tools they need to develop their careers within the company.

In 2010-2011, we have introduced:

- A framework for leadership and management development for our managers and leaders of the future. The management development aspect has been piloted and is due to be run regionally over the next year.
- Behaviour indicators. Behaviour indicators define the types of behaviour expected in different roles, and support our values and culture. The indicators complement our performance management system and will help people at all levels understand the requirements for success. We have also enhanced our online performance management tool.
- A global framework that identifies the support, information, tools and training new employees require in the first six months to understand and embrace the values and culture of the company, and to achieve competence in their role. This includes the further development of our induction programme.

In addition, following the successful launch of our talent programme in 2010-2011 (as outlined in our 2010 COP), we have identified a new group of exceptionally talented people across the business and engaged them in the 2011-2012 programme. The programme provides tools, coaching and mentoring to help the group build a successful career at Control Risks.

Control Risks regularly reviews and seeks to enhance the rewards it offers its employees. In line with our values, our approach to reward aims to be fair, consistent, transparent and easily understood so that we are able to attract and retain the most talented people.

In 2010-2011, we have reviewed:

- Insurance provisions. The review aimed to ensure that we meet our duty of care obligations and to provide an insurance offering that is consistent across the company.
- Bonus and shares incentives.

We have also enhanced our employment practices by:

- Issuing a recruitment guide for managers.
- Putting in place a referral policy which has been adapted regionally to take into account local practices.
- Undertaking a review of global employment practices to ensure continuing compliance, developing local policies and processes where necessary.

Plans for 2011-12

Building on our activities in 2010-2011, we plan to:

- Continue to expand the development opportunities available to our people worldwide, including new e-learning modules.
- Continue to develop our people by providing access to learning opportunities and empowering them to manage their own careers within the company.
- Complete a global audit of salaries and benefits, including robust benchmarking.
- Conduct a global audit of our human resources policies and processes to ensure that we are taking a consistent approach across our offices and meeting best practice.
- Conduct a review of contracts to ensure compliance in line with changing legislation.

Environment

- Principle 7:** Business should support a precautionary approach to environmental challenges;
- Principle 8:** Undertake initiatives to promote greater environmental responsibility; and
- Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.

Commitment

Control Risks' commitment to the environment is outlined in our Environment policy, which includes the following statements:

Overall

Control Risks is committed to assessing, monitoring and reducing its environmental impacts. Control Risks expects similar commitments from its suppliers and contractors.

Control Risks will comply with all applicable environmental laws and standards in each location where it operates and will aspire to meet higher standards of best practice.

Control Risks will ensure that its employees are briefed on company environmental policy and receive relevant training on implementing environmental commitments.

Control Risks will take environmental considerations into account when accepting and undertaking work on behalf of its clients.

Working with clients

Control Risks will give its clients the best possible advice that is consistent with the environmental responsibilities of the company and of its clients.

Risk assessment

Control Risks considers environmental impact a significant risk factor in its risk consulting methodology.

Risk assessment must assess the risk that Control Risks' activities – and those of its clients – could have strongly negative environmental impacts. Control Risks' initial risk assessment will be subject to regular review.

We are committed to the continuous monitoring, evaluation and review of our performance in three key areas, across all operating locations:

- 1. Reducing workplace waste** by reducing consumption and increasing recycling of office materials.
- 2. Shrinking greenhouse gas output** by increasing energy efficiency and reducing carbon intensity of our operations.
- 3. Promoting environmental sustainability** in our employee, supplier, leasing and contractor relationships.

The Group Executive Committee reviews on an annual basis the company's progress in these three key areas, and reviews the Environment policy annually to ensure that it continues to reflect the company's goals.

The Environment policy also highlights our commitment to the Compact, with the following statement: "Control Risks will report annually on its environment commitments and performance through its participation in the UN Global Compact".

Systems

Our Environment policy allocates specific areas of responsibility to help us ensure that the company meets its targets on environmental management:

The **Group Executive Committee** is responsible for the implementation of the policy, and a member of the Group Executive Committee sponsors and champions environmental management within the company.

Regional Directors are responsible for putting in place environmental initiatives for all offices within their region in line with the policy and with local legislation, and for reporting annually to the Group Executive Committee on our three areas of focus.

Five regional environmental champions are responsible for co-ordinating the company's approach to environmental management in all Control Risks' offices in their region.

All Control Risks' employees are encouraged to suggest ways of improving the company's environmental management.

With around 40% of our permanent staff based in our London office, we recognise that environmental management enhancements achieved in this office will have the greatest impact.

Control Risks formally includes the environment on its corporate risk register, which is reviewed at regular intervals by the Group Executive Committee.

As highlighted in our 2010 COP, we have now included compliance with applicable environmental legal and regulatory requirements in our internal audit process.

Activities

As noted in our 2010 COP, our August 2010 environmental management survey of Control Risks' offices worldwide gave us a snapshot of the company's environmental position worldwide and a roadmap for action.

Our regional environmental champions now submit regular reports outlining progress in their respective regions in our three areas of focus.

The Group Executive Committee in July 2011 reviewed our Environment policy and undertook its first annual review of the company's progress in our areas of focus, as follows:

Reducing workplace waste. Offices which are able to measure energy consumption are now recording the results, and a 5% target reduction has been set for the year ahead. We have identified 12 recycling categories, and are also recording the total number of categories in which each office is recycling. Facilities for recycling vary significantly between our office locations, but champions are identifying where better use can be made of existing facilities, and are taking steps to improve our recycling record.

Shrinking greenhouse gas output. We are increasingly using webcasting for meetings, and for marketing and training purposes, as well as for consulting. Our provider in Europe, CO2NeutralConferencing.com, is understood to be the world's first carbon neutral provider of audio, web, video and event conferencing. Our staff are asked to avoid air travel when possible. Travel within Europe frequently involves use of reportedly carbon-neutral Eurostar trains. All our offices now measure air travel where possible. After careful consideration, the Executive Committee has taken the view that it is not at this stage appropriate to set a percentage target reduction by air traveller as the nature of Control Risks' business means that travel is a necessity. However, it will keep this decision under regular review.

Promoting environmental sustainability. Our regional environmental champions are spearheading the drive to raise awareness and promote environmental sustainability across the company. Momentum is gathering pace as our champions share the activities they are undertaking in their respective regions. Initiatives have included:

- Our environmental champion for Europe in May 2011 included an environmental update and the policy in a newsletter issued to all EMEA staff.
- In August 2011, our regional environmental champion for the Middle East recommended that Control Risks join the Emirates Environmental Group (EEG): the company is now applying to become a corporate member.
- Our Americas environmental champion has tasked the region's travel management provider agency to highlight carbon emissions per flight and a format for recording travel and related emissions is being devised.

Meanwhile, we have now included awareness of our Environment policy and the activities we are undertaking in our three areas of focus in our global orientation and induction programmes for people joining the company.

Plans for 2011-2012

- The Group Executive Committee member responsible for sponsoring environmental management will chair workshops to raise awareness of the company's environmental initiatives, and to help our people promote best practice in considering environmental issues when undertaking work for our clients.
- Environmental champions will give an annual presentation to staff on environmental progress in their region.
- Six-monthly updates will be issued to all staff on the company's progress worldwide in our three areas of focus.

Anti-corruption

Principle 10: Business should work against corruption in all its forms, including extortion and bribery.

Commitment

Control Risks' commitment to the Tenth Principle is expressed in its *Code of Ethics*, which is available on our external website (www.control-risks.com), and states:

"Business Integrity. Business integrity goes beyond compliance with the law, and involves the application of our core values. Control Risks does not pay bribes or receive kickbacks either directly or indirectly. Control Risks' employees are expected to use their judgement not just to avoid malpractice but to promote good practice in accordance with the company's commitment to high standards of integrity."

We elaborate on this statement in our Anti-Bribery and Anti-Corruption policy, which was revised in June 2011, and is also available on our external website. The policy makes specific reference to the US Foreign Corrupt Practices Act (FCPA) and to the UK Bribery Act, which came into force in July 2011. At the same time it affirms Control Risks' commitment to abide by all national laws relating to bribery and corruption in the jurisdictions where we operate. The policy covers: bribes and kickbacks; facilitation payments; public officials; gifts hospitality and expenses; personal conflicts of interest; charitable donations; political activities; business relationships, and audits and accounts. The policy states the following with regard to business partners:

"The company expects its business partners to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this policy. This requirement applies to agents, subcontractors and joint venture partners. In cases where the company is unable to ensure these standards, it will reconsider the business relationship."

Control Risks has an Anti-corruption Strategy Working Group, with representatives from all geographical regions, to coordinate our internal and external activities in this area. These are summarised in the sections below.

Our internal compliance activities and our external consultancy complement each other. Through our client work and through our 'thought leadership' activities, we hope to make a wider contribution to raising anti-corruption standards in business.

Systems

Internal training

Our anti-corruption policy is integrated into all aspects of our internal training programmes from the induction of new employees to the advanced training required of senior managers.

In July 2011 we introduced a new e-learning programme to reinforce our Anti-Bribery and Anti-Corruption policy. The programme is tailored to meet the specific requirements of Control Risks, and is compulsory for all employees. The programme summarises the key points of the UK Bribery Act and the FCPA, explains how they apply to Control Risks, and provides illustrative examples with a set of case studies. The course concludes with an online multiple-choice test with a required pass mark of 90%. We monitor employees' performance and completion of the test through our online Learning Management System.

From now on, all new employees will be required to complete the e-learning programme as part of their induction training, and we will provide further, more detailed training for employees as they advance through the company and take on greater responsibilities.

In November 2011 Control Risks is introducing a series of face-to-face workshops on our Anti-Bribery and Anti-Corruption policy. The workshops will combine briefing on the latest international developments with a series of interactive scenario exercises. We will run the workshops across our international network of offices in 2011-2012.

Meanwhile, we continue to integrate anti-corruption training into our regular programmes for middle and senior managers (for example, our practice leaders and country managers).

Anti-corruption risk assessments and reviews

Our Risk Manager and Internal Auditor conduct regular risk reviews and internal audits of all key business units and international offices. As a matter of routine, these audits include a review of all aspects of compliance with local and international law as well as company policy.

In August 2011 we initiated a special company-wide risk review to reinforce our Anti-Bribery and Anti-Corruption policy. The first stage consisted of a questionnaire designed to review potential risks in the light of key aspects of our policy (e.g. the ban on facilitation payments, relationships with business partners etc), and this is to be completed by all practice leaders as well as the country managers in each of our international offices.

The second stage, which will continue through late 2011 and early 2012, will be to review the responses to these questionnaires

with a view to analysing potential vulnerabilities and reinforcing our anti-corruption strategies.

Internal whistleblowing and ethics consultation procedures

Control Risks' employees are encouraged to make an anonymous report if they suspect that a staff member is engaged in unacceptable or unethical conduct – including corruption - and if they feel unable to raise the issue with their line manager.

Similarly, employees are encouraged to consult the company Ethics Committee if in doubt about the ethics of specific business initiatives or the integrity of potential business partners. For example, our Client Acceptance and Engagement Management Policy states that the company will “take account of ethical and reputational issues, as well as legal compliance” when deciding whether to work with particular clients or to take on new assignments. The Committee met regularly to discuss such questions in 2010-2011.

Activities

Thought leadership

Control Risks contributes to a wider understanding of the need for more effective anti-corruption strategies through its own publications, its contribution to external publications and its participation in national and international conferences and seminars. Our activities in 2010/2011 included the following:

Control Risks publications

We report regularly on international anti-corruption developments in *Integrity Matters*, our quarterly online newsletter. Recent editions have included feature articles on the UK Bribery Act, corruption risks in Africa, and a major international enforcement case in Australia.

Riskmap, our annual flagship publication, contained a feature article on international companies' anti-corruption compliance requirements. Reports on corruption trends feature prominently in *Country Risk Forecast*, our regular online service on political and security risk, as well as our other research reports for individual clients.

Contributions to external publications

Control Risks consultants frequently contribute 'think-pieces' to external publications. In 2010-2011, examples included the International Bar Association's *Anti-Corruption Committee Newsletter* and its *Criminal Law Committee E-bulletin*, the *Indian Business Law Journal*, *Australia Legal Business* magazine and *Fraud Intelligence* magazine.

Similarly, Control Risks' analysis of international anti-corruption developments was quoted in media outlets ranging from the *BBC*, *The Times*, the *Daily Telegraph*, *Management Today* and *The Wall Street Journal*.

Participation in anti-corruption conferences and seminars

On a similar note, Control Risks consultants frequently take part in anti-corruption conferences and seminars, often in association with law firms. Recent examples include joint seminars with the international law firm Baker Mackenzie in Australia; with Drew Napier in Singapore; and with Stikeman Elliott in Canada.

UK Ministry of Justice consultation

In September 2010 the UK Ministry of Justice (MoJ) invited comments on its draft guidance document outlining the 'adequate procedures' that companies needed to implement the UK Bribery Act. Control Risks' contributed to the consultation with a letter supporting the objective of the Act, but suggesting that the MoJ document could include on how companies can face up to demands for bribes that amount to a form of extortion.

Transparency International

In July 2011, our Sydney office joined Transparency International Australia as a corporate member. Our Berlin office is already a corporate member of Transparency International-Deutschland, and our head office in London has been a member of the Transparency International-UK Corporate Supporters' Forum since its inception a decade ago. In 2010-2011 John Bray, one of our lead anti-corruption specialists, contributed to an external evaluation of the Transparency International Secretariat in Berlin on behalf of Norad, the Norwegian aid agency.

Plans for 2011-2012

In 2011 and 2012 we plan to:

- Complete the process of holding three-hour face-to-face anti-corruption training modules in all 34 international offices
- Complete the anti-corruption risk review initiated in August 2011 in all international offices
- In the light of the findings of the review draw up strategies to reinforce our anti-corruption programme.
- Review and reinforce the monitoring and review procedures of our anti-corruption programme.

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