

**Communication on Progress 2012**



# The Global Compact Communication on Progress

<b>Control Risks and the Global Compact</b>	<b>1</b>
<b>About Control Risks</b>	<b>1</b>
<b>CEO's statement of continued support for the Global Compact</b>	<b>2</b>
<b>Human Rights</b>	<b>3</b>
Commitment	3
Systems	3
Activities	3
Plans for 2012-2013	4
<b>Labour</b>	<b>5</b>
Commitment	5
Systems	5
Activities	6
Plans for 2012-13	6
<b>Environment</b>	<b>7</b>
Commitment	7
Systems	7
Activities	8
Plans for 2012-2013	8
<b>Anti-corruption</b>	<b>9</b>
Commitment	9
Systems	9
Activities	10
Plans for 2012-2013	11

# 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 people 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.

## 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 30 countries, we work across the world and operate in accordance with shared standards and principles. We employ around 2,000 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 - and recognised for - its 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.

Control Risks formally signed up to the UN Global Compact in September 2007, and is fully committed to embracing, supporting and implementing its ten principles.

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.

# CEO's statement of continued support for the Global Compact

I am pleased to reaffirm Control Risks' continuing support for – and commitment to – the UN Global Compact. This is our fourth Communication on Progress (COP).

In the complex environments in which we operate, anti-corruption and human rights are important issues. Our report highlights the steps we are taking to ensure that our people fully understand their part in upholding our commitments as well as considering Control Risks' contribution to the understanding of the wider business and international communities.

I was reassured by the findings of an internal anti-bribery and anti-corruption survey we conducted of our heads of office and major departments as they reflect high levels of awareness of the problems we might face and ways of dealing with them effectively. However, the survey highlighted the fact that we need to be systematic in reinforcing our policy, and I will be keeping a close eye on how we achieve this in the year ahead.

Meanwhile, I am delighted that Control Risks has been able to contribute to the development of a set of standards and a regulatory process for the UK private security industry, which include a focus on human rights. This initiative stems from collaboration between the Security in Complex Environments Group (SCEG - a special interest group within the Aerospace Defence and Security Group), chaired by Control Risks Director Chris Sanderson, and the UK Foreign and Commonwealth Office.

As far as the labour principle is concerned, we have continued our drive to manage our people consistently and in line with our values, providing learning and development opportunities worldwide to help people build the skills and knowledge they need to progress within the company.

I am pleased to report that we have continued to make good progress on environmental issues since the last COP. In addition to the work undertaken by our regional environmental champions, we have now started to promote our environmental commitments in our internal publications and will be encouraging our people globally to make a personal contribution to environmental initiatives, both within the company and outside it. These initiatives follow workshops chaired by the Executive Director responsible for our Environment policy. I for one will be playing my part.

I look forward to reporting on our progress next year.



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 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 website ([www.controlrisks.com](http://www.controlrisks.com)).

Our Human Rights policy makes specific reference to the Universal Declaration of Human Rights, the VPs, the UN Global Compact, the Montreux Document, the International Code of Conduct for Private Security Providers and the UN *Guiding Principles on Business and Human Rights*.

## 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 2011 COP we have introduced a new training programme for all security consultants working in high-risk environments in Africa and the Middle East. Consultants are required to take part in a briefing on *Human Rights and Security Management*, supported by our *Human Rights Essentials* documentation. We use an online test to ensure that consultants fully understand their human rights responsibilities. To date, 360 of our embedded consultants have undertaken the online training.

### Risk assessment and due diligence

Control Risks integrates human rights into all aspects of our internal risk reviews as well as our risk assessment and due diligence consultancy for external clients.

### The Ethics Committee

Our people 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

Our people are able to make an anonymous report if they suspect that a member of Control Risks 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 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.

Control Risks is a member of the Aerospace Defence and Security Group (ADS - [www.adsgroup.org.uk](http://www.adsgroup.org.uk)), a leading UK-based industry association with some 900 members. Our Director of Government Support, Chris Sanderson, acts as chairman of the Security in Complex Environments Group (SCEG), a special interest group within ADS. Since June 2011, SCEG has

been working with the UK Foreign and Commonwealth Office (FCO) to develop a self-regulation system for the UK private security industry. SCEG expects to be able to agree a set of standards and a regulatory process for the UK private security industry in 2013. This will include a particular focus on human rights as well as other operational and management issues.

At the international level, Control Risks was one of the first signatories of the International Code of Conduct for Private Security Providers (ICOC-PSP - [www.icoc-psp.org](http://www.icoc-psp.org)) in November 2010. Signatories to the Code 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”. Through SCEG, Control Risks has been engaged in the discussions leading to the establishment of an independent governance and oversight mechanism to supervise signatories’ implementation of the ICOC-PSP. This will include a certification and performance assessment process to ensure that signatories meet human rights and other international standards.

#### Thought leadership

In September 2011, shortly after the submission of our previous COP, Control Risks consultant John Bray took part in a panel on conflict zones at a conference on *Business and Human Rights: Implementing the UN Guiding Principles* organised by the British Institute of International and Comparative Law. Together with Antony Crockett of the law firm Clifford Chance, John Bray has contributed a paper on “Responsible risk-taking in conflict-affected countries: the need for due diligence and the importance of collective approaches” for a forthcoming special issue on the UN Guiding Principles in the *International Review of the Red Cross*.

## Plans for 2012-2013

In the year ahead our plans include:

- Our Group Risk Manager will include human rights as a specific agenda item when conducting her regular reviews of our business teams and international offices. The resulting action plans will be formally reported to the Group Board and Audit Committee.
- We will continue to strengthen our human rights risk review processes before taking on new assignments for clients operating in complex and conflict-affected environments.
- We will continue to work within the security industry to develop common standards on human rights issues.

# 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 our people 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 people, 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 have accountability to ensure 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, together with its agents, representatives, joint venture partners and suppliers, expects 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 people at all levels meet those standards and achieve their full potential. We aim to develop our people by giving them access to learning opportunities and empowering them to manage their own careers within the company. Training and development take the form of e-learning, residential and non-residential courses and workshops run internally and externally, regional training workshops, and management programmes.

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 people have the skills and tools they need to develop their careers within the company.

In 2011-12, we have:

- Added new business areas to our accreditation programme. The programme is designed to ensure that our people are clear about our standards and identifies areas where people need development.
- Rolled out on a regional basis the management development aspect of our framework for leadership and management development, following the pilot in 2010-11.
- Continued with our talent development programme, which is now in its third year. This 12-month programme provides a group of exceptionally talented people with tools, coaching and mentoring to help them build a successful career at Control Risks.
- Launched a training programme for consultants worldwide to enhance their commercial skills.

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. We regularly review and seek to enhance the rewards we offer our people.

In 2011-12, we have:

- Introduced a share incentive scheme for all our people globally.
- Designed a new policy to ensure that when we relocate people between our offices, we do so in a consistent and transparent way.
- Developed the company's intranet to ensure that all our people have access to the resources available to them.
- Continued to review our insurance provisions in order to ensure that we meet our duty of care obligations and provide an insurance offering that is consistent across the company.

## Plans for 2012-13

We plan to:

- Introduce a secure global information system for the HR team. This will allow us to manage the information we hold about our people in a consistent way, and help us meet compliance risks more effectively.
- Design sector specific training for our consultants and analysts.
- Launch a new e-learning platform for all people worldwide. This will help us provide consistent learning and development opportunities for our people in all our offices.
- 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 (mentioned in our 2011 COP and part of our three-year plan).
- Conduct a review of contracts to ensure compliance in line with changing legislation (mentioned in our 2011 COP and part of our three-year plan).



# 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.

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.

## 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. The champions submit regular reports outlining progress in their respective regions in our three areas of focus. A number of offices have now identified an environmental representative to work with their regional champion.

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

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

Compliance with applicable environmental legal and regulatory requirements is included in our internal audit process.

## Activities

The Group Executive Committee in July 2012 reviewed and confirmed our Environment policy, and reviewed the company's progress in our three areas of focus:

**Reducing workplace waste.** Our offices measure energy consumption wherever they can and record the results. 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. We are therefore pleased to report a reduction in electricity consumption of 4.45% in our London office over the past year.

Similarly, we record the categories in which each office undertakes recycling (we have identified 12 recycling categories). Facilities for recycling vary significantly between our office locations, and our champions are tasked to identify ways of making better use of existing facilities and of improving our recycling record. For example, our Los Angeles office is now making full use of the building's recycling programme; our South African office champion plans to recycle glass, plastic and cans as well as paper; and our Dubai office champion has in the last year started to recycle paper, plastics, glass, cans and printer cartridges. A new initiative to recycle IT equipment in our North American offices led to more than 70 laptops/monitors/power cords being recycled.

**Shrinking greenhouse gas output.** Our staff are asked to avoid air travel whenever they can and, where possible, our offices measure air travel. Webcasting - for meetings, for marketing and training purposes, as well as for consulting - is increasingly becoming standard practice and the introduction of a new online instant messaging, video conferencing and screen sharing platform is also helping us reduce travel. We are pleased to note a 12.4% reduction in CO2 emissions from our London office as a result of reduced air travel. Within Europe travel frequently involves use of reportedly carbon-neutral Eurostar trains. Meanwhile, tracking data on the carbon footprint created by air travel in our Americas offices will shortly be made available.

Following recent discussions at Group Executive Committee level, we will be seeking to influence the management of our office buildings globally to optimise energy efficiency; identify the environmental initiatives buildings have in place; and ensure that we are taking advantage of all available programmes. The London office will also carry out an eco audit in the year ahead. Meanwhile, the building in which our Los Angeles office is housed has recently been awarded the highest possible LEED (Leadership in Energy and Environment Design) rating.

**Promoting environmental sustainability.** The Group Executive Committee member responsible for sponsoring environmental management in July 2012 chaired environmental workshops with two groups of the exceptionally talented individuals taking part in our global talent programme (see Labour). The ideas generated were formally discussed at a subsequent meeting of our Executive Committee, and the results are reflected in our plans for 2012-2013.

Our Environment policy and the activities we are undertaking in our three areas of focus are included in our global orientation and induction programmes for people joining the company. Reminders about our environmental policy were circulated within Europe via email in January and May 2012. We are now planning to issue regular global updates in the year ahead (see Plans).

We are starting to identify the environmental policies and practices of our suppliers and contractors to ensure they meet best practice. Many vendors include environmental information on their websites, and we are starting to take this into account in our vendor selection process.

## Plans for 2012-2013

In the year ahead, we plan to:

- Highlight the company's commitment to the environment in our internal publications *Global People Update* and *GroupVine*, providing updates on our progress worldwide in our three areas of focus and encouraging people to make a personal contribution to environmental initiatives.
- Expand the current employee one-day-a-year volunteer programme to include an option for people to take part in a local project or charity engaging with the environment.
- Commission an eco audit of our London office to help us determine what we are able to do as a company to reduce our impact on the environment, and as a result to establish the correct priorities. Other offices will follow as appropriate.

# 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 website ([www.controlrisks.com](http://www.controlrisks.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 is also available on our website. The policy makes specific reference to the UK Bribery Act and to the US Foreign Corrupt Practices Act (FCPA). 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: “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-Bribery and Anti-Corruption policy forms part of our internal training programmes for all our people at all levels.

As reported in our 2011 Communication on Progress (COP), 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 our people. The programme now forms part of induction for those joining the company in all our offices.

We have now completed in all our offices the series of three-hour, face-to-face workshops on our Anti-Bribery and Anti-Corruption policy we began in autumn 2011. Based on a common framework, the workshops were adapted to the specific requirements of each office. They combined a briefing on the latest international developments with a focus on specific problems such as demands for small payments in connection with routine government transactions, the integrity risks associated with business intermediaries, and gifts and hospitality. We will now implement an annual training exercise to continue to engage with colleagues on this subject.

### 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 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. We have a robust follow-up process for all actions identified. Furthermore, all our business units are asked at regular intervals to declare any breaches of policy or near misses. In 2011-2012 we have strengthened our legal team with two new appointments: a Legal Counsel based in London and another in Singapore to work with our Asia Pacific region.

As reported in our 2011 COP, we initiated a company-wide risk review in 2011 to reinforce our Anti-Bribery and Anti-Corruption policy. As part of this review we issued an online survey to heads of office and heads of London departments who operate across different regions. The survey was designed to identify potential problems that might arise under each of the main headings in the policy, for example, gifts, hospitality and expenses. The survey comprised a combination of multiple choice and open-ended questions.

Analysis of the survey – which has taken place since our 2011 COP - confirms our collective understanding of the challenges we face. At head office level and in the OECD countries generally, we anticipate few corruption-related problems. However, the nature of our work means that our people from these offices frequently travel to countries where levels of corruption are higher. Many of our regional offices are in locations where demands for large and small bribes are common.

The findings of the survey were reassuring in that they reflected high levels of awareness across the company of the kinds of problem we might face, as well as an understanding of ways to deal with them effectively. At the same time, the survey underlined the need for constant reinforcement of the policy, both in theory and in practice. The findings from the survey indicate that we need to:

- Be more consistent and systematic in our briefings on ABC policy to our professional advisers and subcontractors. This theme was discussed in the face-to-face workshops, and new legal agreements and detailed procedures are being developed.
- Monitor how the specific financial thresholds in our gifts and corporate hospitality work in practice. Monitoring is to include a 'gifts and hospitality register', in which we will record cases where it has been necessary to seek permission to exceed the normal financial threshold.
- Be more systematic in sharing best practice and the lessons learnt from our own experience and from the experience of our clients. We are setting up an area on our intranet to help achieve this.

#### Internal whistleblowing and ethics consultation procedures

Our people 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, our people 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 2011-2012.

## 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 2011-2012 included the following:

#### Control Risks publications

We report regularly on international anti-corruption developments in *Integrity Matters*, our quarterly online newsletter which is distributed free of charge to some 2,500 subscribers across the world. Recent editions have included feature articles on facing up to extortion, Japan's enforcement of foreign bribery laws, and corruption controversies in India.

Reports on corruption trends feature prominently in *Country Risk Forecast*, our online subscription service on political and security risk, as well as our research reports for individual clients.

#### Contributions to external publications

Control Risks' consultants frequently contribute “think-pieces” to external publications. In 2011-2012, examples included *Australasian Legal Business*, *Shanghai Business Week*, *Fraud Intelligence*, *Latin Lawyer*, *Corporate Compliance Insights* and *Corporate Risk Canada*.

Similarly, Control Risks' analysis of international anti-corruption developments was quoted in media outlets ranging from Reuters and Bloomberg reports to *Audit & Risk* magazine (published by the UK Chartered Institute of Internal Auditors) and in broadcast interviews for the BBC and Channel NewsAsia.

#### Participation in anti-corruption conferences and seminars

Control Risks' consultants regularly organise and contribute to anti-corruption conferences and seminars. For example, in Asia we gave presentations on anti-corruption strategies at the China Anti-Corruption Forum in Beijing in October 2011 and at the Asian legal counsel's In-House Community Forum in Tokyo in December 2011. In March 2012 our Berlin office organised a seminar on *Corruption, compliance and the impact on businesses in Central and Eastern Europe* in association with Kinstellar, a local law firm. Peter Eigen, the founder of Transparency International (TI), gave a keynote speech. In June 2012 we organised a lunch meeting in Los Angeles on *Navigating the challenges of FCPA investigations in complex and hostile jurisdictions*, and in Montreal we led a breakfast seminar on *Preventing and managing a corruption crisis abroad*, together with the law firm Stikeman Elliott. Meanwhile, Control Risks is contributing a paper on *Facing up to demands for small bribes* at a conference organised by the Society of Petroleum Engineers in Perth, Australia, in September 2012; and our Sydney office is planning a series of anti-corruption seminars in association with the Australian law firm Corrs Chambers Westgarth.

#### OECD Working Group on Bribery UK 'Phase 3' evaluation

Experts from the OECD Working Group on Bribery visited London in October 2011 during its Phase 3 evaluation of the UK's implementation of the OECD Anti-Bribery Convention. Chris Torrens, Deputy Director of Control Risks' Europe Global Client Services team, contributed to the Working Group's consultation session with UK business representatives.

#### Transparency International

Control Risks is an active member of the TI-UK Corporate Supporters' Forum and a corporate member of the TI chapters in Germany and Australia. In 2012 John Bray, one of our lead anti-corruption specialists, contributed to an external evaluation of the TI Defence and Security Programme (TI-DSP) on behalf of the UK Department for International Development (DFID).

He also prepared the Japan section for TI's annual progress report on the enforcement of the OECD Anti-Bribery Convention.

#### Other civil society initiatives

In London, Control Risks is also a supporter of the Anti-Corruption Forum (ACF), an alliance of businesses with an interest in the international infrastructure, construction and engineering sectors, as well as the cross-sectoral International Business Leaders' Forum (IBLF). In June 2012 we hosted and co-presented an IBLF breakfast briefing on *Trust and business ethics*.

In China, Control Risks is a member of the IBLF's local affiliate, the China Business Leaders' Forum (CBLF). In February 2012, Control Risks Regional Director (Greater China) Neal Beatty chaired a special CBLF lecture on international anti-corruption initiatives by UK Serious Fraud Office (SFO) Director Richard Alderman in Beijing. Neal Beatty also served as a member of the editorial group for a CBLF publication, the bilingual English/*Chinese Business Integrity Handbook*, which was published in May 2012. The handbook will be distributed free of charge through, among other channels, the Global Compact Network China.

In Brazil, our General Manager, Geert Aalbers, has been contributing to an International Bar Association (IBA) initiative to prepare an *Anti-Corruption Compliance Handbook for Business*.

## Plans for 2012-2013

In 2012 and 2013 we plan to:

- Implement the gifts and hospitality register.
- Develop and expand our Anti-Bribery and Anti-Corruption intranet site.
- Launch the next stage of anti-corruption training to reinforce our existing commitments, using a combination of e-learning and face-to face workshops.
- Review our Whistleblowing policy.

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