

**Communication on Progress 2010**



# The Global Compact Communication on Progress

<b>CEO's statement of Control Risks continued support for the Global Compact</b>	<b>1</b>
<b>Human Rights</b>	<b>2</b>
Commitment	2
Systems	3
Activities	3
Plans for 2010 - 2011	3
<b>Labour</b>	<b>4</b>
Commitment	4
Systems	4
Activities	5
Plans for 2010 - 2011	5
<b>Environment</b>	<b>6</b>
Commitment	6
Systems	7
Activities	7
Plans for 2010 - 2011	7
<b>Anti-corruption</b>	<b>8</b>
Commitment	8
Systems	8
Activities	9
Plans for 2010 - 2011	10

## 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 1,500 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.

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

Control Risks formally signed up to the UN Global Compact in September 2007, and is fully committed to embracing, supporting and implementing the ten principles. This is our second Communication on Progress. As before, this places particular emphasis on human rights and anti-corruption. 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 can make a distinctive contribution to the wider business and international communities.

I was delighted to represent Control Risks at the June 2010 UN Global Compact Leaders Summit in New York, marking the tenth anniversary of the Compact. The Compact has come a long way since its inception and the summit provided a valuable and worthwhile opportunity to focus on the corporate responsibility priorities that lie ahead.

Control Risks is committed to advocating and implementing the 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, 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, Business Integrity and Human Rights policies are central to the policies which underpin all aspects of our work and our internal processes.

Regarding progress on the specific principles, since our last COP we are pleased to have made further progress in consolidating our activities around the Human Rights principles. The Business and Human Rights Resource Centre now lists Control Risks as one of more than 270 firms to publish a human rights policy, and the Institute of Human Rights and Business recently listed Control Risks as the only professional services company to offer robust human rights due diligence services for private enterprises.

As far as the Labour principles are concerned, we have substantially reinforced our commitment to our people, expanding our HR team and introducing global HR systems to ensure that we treat our people fairly and consistently.

We are proud of our continuing contribution to the Anti-corruption principle, with our thought leadership in the areas of anti-corruption, anti-bribery and anti-fraud, and our involvement in policy debate, publications and participation in industry initiatives. We have accumulated significant experience in helping clients implement anti-corruption measures, both at head office level and on the front line in countries beset by endemic corruption. It is this combination of strategic and tactical experience that is most distinctive about our contribution in this area.

Finally, I am confident that we have a road map for action on the Environment principle. Following Board-level approval of a new Environment policy, we undertook a survey of all our offices to obtain a snapshot of our environmental position worldwide. The results will enable our Executive Committee to set meaningful targets for the future.

I am pleased to confirm Control Risks' continuing support for – and commitment to – the Compact, and I look forward to the company making a significant contribution to the Compact's activities over the next decade.



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](http://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 Professor John Ruggie's UN report on *Protect, Respect and Remedy: a Framework for Business and Human Rights* (May 2008).

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 who are already signatories, but also when working with other entities facing similar challenges in conflict-affected areas.

## Systems

### Training and reference documents

Control Risks runs a three-week *Hostile Environment Close Protection Operatives Course (HEPCO)* for new entrants to the security industry. Before embarking on the course, they are required to read Control Risks' Human Rights policy, the Universal Declaration on Human Rights, the VPs, the Montreux Document and a selection of UN Global Compact human rights material. Human rights issues are integral to the course, and participants are required to complete a questionnaire to ensure that they have understood the key human rights principles. Control Risks employs many of the 'graduates' of the course in high-risk environments such as Iraq and Afghanistan.

All our people in operational roles are required to complete a six-day HEPCO before they are deployed to hostile environments such as Iraq.

In February 2010 we held a series of training sessions on the VPs for our consultants working with international companies in Nigeria.

Control Risks provides its consultants with its own reference documents: *Introduction to Security and Human Rights and Consultant Briefing Guidelines* on the VPs.

### 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 – on human rights or any other ethical issue - and if they feel unable to raise the issue with their line managers.

### Third party complaints

Our third party complaints process is included in a policy document which 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 is playing an active part in the UK government's ongoing consultation on the regulation of Private Military and Security Companies (PMSCs). Control Risks is a Private Security Company (PSC). Our contributions to the consultation include a firm commitment to human rights standards. On a similar note, we have recently joined the Aerospace Defence and Security Group ([www.adsgroup.org.uk](http://www.adsgroup.org.uk)), a leading industry association. We will be working within the Group to promote high industry standards.

Internationally, we contribute to a process whereby the Geneva Centre for Democratic Control of the Armed Forces (DCAF) is seeking to develop an International PMSC Code of Conduct in partnership with the Swiss Department of Foreign Affairs.

### Thought leadership

In December 2009, Control Risks made a presentation on "Due diligence and the corporate responsibility to respect human rights" at the conference on *Corporate complicity in human rights violations* organized by the Lauterpacht Centre for International Law, University of Cambridge.

Our work in support of international corporations working in high-risk environments naturally leads to a special interest in the theme of business and peacebuilding. Our recent activities in this area include a presentation at the *United Nations Global Compact Business and Peace Workshop* at the University of Tokyo in April 2010. The workshop was set up to discuss the guidance document "Responsible Business in Conflict-Affected and High Risk Areas".

Other recent contributions include a briefing paper on the risks and opportunities for peacebuilding associated with *Foreign Direct Investment in Conflict-affected Contexts*. The paper was published in April 2010 by International Alert, the leading UK-based peacebuilding NGO (see [www.international-alert.org](http://www.international-alert.org)).

### Social risks consultancy

Control Risks includes human rights considerations in all aspects of its consultancy, notably its Global Risk Analysis (GRA) assessments, and operational security consultancy in high-risk and conflict-affected environments. At the same time, we are developing a practice specifically focusing on human rights as part of our social risks consultancy. Recent examples of our work in this area include an initial human rights impact assessment for an international petroleum company based on on-the-ground research in a conflict-affected country. At the policy level, we have been advising a leading international communications company on its human rights risk assessment processes and its overall human rights policy.

## Plans for 2010-2011

Control Risks has formed an inter-departmental Human Rights and Security Committee with a view to undertaking a comprehensive review of the implementation of the company's Human Rights policies. The committee includes representatives from our offices worldwide, as well as our London head office, and a director from Control Risks Group Executive Committee.

In the year ahead, the committee plans to:

- Pilot a new risk assessment 'framework' that provides a more systematic approach to the human rights assessment procedures we undertake before taking on new assignments.
- Develop new briefing materials for our operational consultants deployed to high-risk areas.
- Design a system for checking our consultants' knowledge of key human rights issues.
- Contribute human rights considerations to the design of a new framework for leadership and management development.

# 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 successful and rewarding careers for everyone we employ. This commitment is reflected in our human resources policies, and in the human resources 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.
- 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, 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.

A grievance policy and process, involving three stages of escalation, is in place to ensure that any issues arising, for example discrimination, are dealt with fairly and objectively.

Control Risks sets high standards for its people. We offer structured training and development programmes for our people at all levels designed to help people meet those standards and achieve their full potential. Training and development takes the form of e-learning, residential and non-residential courses and workshops run internally and externally, regional training workshops, and management and senior 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

### Employee survey

We conducted a global survey of a sample group in April-May 2010 to help us understand the importance our people place on a number of key issues (including culture and diversity) and to determine how satisfied they are with the way the company handles such issues. We reviewed our priorities following the survey, and revised our human resources strategy for the year ahead accordingly.

### Diversity

We are continuing to make progress in our diversity initiative. In order to help women build long-term careers and progress to senior roles, we are piloting a maternity coaching scheme. We are also reviewing our flexible working provisions. Meanwhile, our new, global human resources system will allow us to report more accurately on diversity, as well as record and manage information related to our people more consistently.

Across our offices, over the last year we have introduced:

- A new performance management system which will help us ensure that we treat our people fairly and consistently.
- A structured promotion process to ensure that people at senior levels are rewarded fairly and consistently.
- An initiative to develop a diverse group of 12 exceptionally talented people who have the potential to lead and drive the success of our business. Their development will include individual mentoring (as highlighted in our plans in our 2009 COP). We will be testing our approach in the year ahead and measuring its success.

## Plans for 2010-2011

We have set ourselves an ambitious programme for the year ahead. We plan to:

- Introduce a competency framework that will define the core competencies and the types of behaviour expected in different roles. The framework will help people at all levels understand the requirements for success, and will underpin recruitment, promotion and performance management.
- Design career paths for key functional areas. This will help people understand the experience they will need to gain and the training they will need to complete before moving into a new role.
- Consolidate new mechanisms for career path planning to support international mobility and diversity, as outlined in our 2009 COP.
- Develop the company's intranet still further, to ensure that all our people have access to the resources available to them. This will include the extension of the family section we highlighted in our 2009 COP.
- Form a working group to establish and promote the strategy on diversity, and to provide metrics so that we can measure and report on diversity within Control Risks globally.
- Build a framework for leadership and management development, and design and deliver foundation modules that will incorporate ethical scenarios, as well as internal processes, skills and behaviours.
- Develop a global framework that identifies the support, information and training a new employee requires in the first six months to understand and embrace the values and culture of the company, and to achieve competence in their role.
- Conduct a global audit of salaries and benefits in a bid to achieve consistency and transparency across 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.

# 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 new Environment policy, which was issued in July 2010 following Board approval. The policy 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.

In developing our new policy, we reviewed and refined our areas of focus as outlined in our 2009 COP. 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 will review on an annual basis the company's progress in these three key areas, and will review 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. Since our 2009 COP, a member of the Group Executive Committee has been appointed to sponsor and champion 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.

The Group Executive Committee has since our 2009 COP nominated four environmental champions (based in Dubai (for Middle East and Africa), London (for Europe), Los Angeles (for the Americas) and Mumbai (for Asia Pacific). Champions are responsible for co-ordinating the company's approach to environmental management in all the 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.

## Activities

Control Risks undertook an environmental management survey of all its offices in August 2010. The survey, which reflected our three areas of focus, included questions on recycling, local laws and standards, energy usage, travel, contractors/suppliers, communication and consulting practices. The survey results have given us a snapshot of the company's environmental position worldwide, and provided us with a roadmap for action.

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

## Plans for 2010-2011

In order to set appropriate and realistic targets for our three areas of focus, we recognise that in some cases we will need to undertake additional research. Taking into account the survey results, our priorities are to:

- Heighten awareness of our new Environment policy and the actions the company is taking to implement the policy.
- Promote best practice within the company in considering environmental issues when undertaking work for our clients.
- Include compliance with applicable legal and regulatory requirements in our internal audit process across our offices.
- Consider the alternatives to business travel that technology offers. The nature of our business means that travel is a necessity, but we are committed to reducing this whenever possible. Our plan for the year ahead is to measure the miles we travel and the related emissions, and to set a percentage target reduction by traveller in 2011-2012.
- Scrutinise the environmental policies and practices of our suppliers and contractors.

# Anti-corruption

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

## Commitment

Control Risks' commitment to the Anti-corruption principle is expressed in its *Code of Ethics*, which is available on our external website ([www.control-risks.com](http://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 Business Integrity policy, which is likewise available on our external website, and makes specific reference to the OECD Anti-bribery Convention and to applicable national and international laws. The policy covers: bribes and kickbacks; facilitation payments; gifts, hospitality and expenses; personal conflicts of interest; charitable donations; political activities; and audits and accounts. The policy states the following with regard to business partners:

Control Risks expects its business partners to adhere to integrity principles that are consistent with those of the company. This applies to agents, subcontractors, and joint venture partners. In cases where Control Risks is unable to ensure these standards, it may need to reconsider the business relationship.

In April 2010, the UK government passed a new Bribery Act covering the payment of bribes to both public and private recipients in the UK and abroad. It will come into effect in April 2011. The Act sets a new standard both nationally and internationally, and Control Risks has set up an *Anti-corruption Strategy Working Group*, with representatives from all geographical regions, to coordinate its internal and external activities in this area. These are summarised 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. Since 2007, we have been running four-day residential programmes for middle and senior managers (for example, practice leaders and country managers): the course emphasises business ethics, including anti-corruption, from the first morning, and includes case studies and dilemma scenarios. In 2009-2010, 32 managers have taken part in this training.

### 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 our Business Integrity policy.

### 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 2009-2010.

# 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 2009-2010 included the following:

### *Control Risks publications*

- In late 2009, we launched a report on *Grey practices in Russia* – for example the mechanisms involved in tax evasion schemes, one-day companies, black cash and offshore ownership structures. All these activities are closely linked to corruption.
- Our flagship *Riskmap 2010* report included a feature article on *International anti-corruption laws: are they really working? If so, how?* The article discussed how far anti-corruption legislation was discouraging legitimate investment in high-risk countries, and explained how well-managed companies could defend their interests, even in high-risk environments.
- In May 2010, we launched the first edition of *Integrity Matters*, a bi-monthly online newsletter focussing specifically on anti-corruption strategies. The first edition covered the UK Bribery Act and the second edition discussed China's anti-corruption laws.

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.

Our analysis is widely cited both in the international media and in policy-making circles. For example, in November 2009, the UK Ministry of Justice cited a Control Risks survey on international business attitudes to corruption in its official 'Impact Assessment' explaining the need for the Bribery Act.

### *Contributions to external publications*

Control Risks' consultants frequently contribute 'think-pieces' to external publications. Since our 2009 COP, these have included:

- The Organisation for Economic Cooperation and Development (OECD) and the Asian Development Bank (ADB) published a paper from Control Risks on "The business case for fighting corruption" in a publication on *Strategies for business, government, and civil society to fight corruption in Asia and the Pacific*.
- Transparency International published a report from Control Risks on 'Public and private sector corruption in Central and South-eastern Europe' in its annual *Global Corruption Report*.

Other recent examples include articles on corruption in publications as diverse as *The World Today* (Royal Institute of International Affairs, London), the *Anti-fraud Network Newsletter*, *China Law and Practice*, *European Supply Chain Management*, *Strategic Risk*, and the highly-regarded, US-based 'Main Justice' blog.

### *Participation in anti-corruption conferences, workshops and seminars*

Since our 2009 COP, Control Risks has run a series of half-day workshops on anti-corruption strategies for business in cities including Amsterdam, Houston, London, Paris, New York, Shanghai and Singapore.

We have also contributed to conferences run by external organisations. For example, we recently held an anti-corruption briefing at the Hong Kong Securities Institute, in addition to our regular breakfast briefings in Guangzhou, Shenzhen, Suzhou and Hangzhou in mainland China. Our New Delhi office led a workshop on 'Anti-corruption in India' at the 2010 *In-House Congress* in Mumbai on 12 May 2010. In January 2010 the head of our Hong Kong office delivered a presentation on developments in China at the annual *Asia Anti-Corruption Congress* in Hong Kong. Similarly, our Singapore office is contributing to the *Anti-Corruption Summit in South & South East Asia* in September 2010.

# Plans for 2010-2011

Reinforcing policy implementation

We plan to hold further:

- **Internal workshops on the UK Bribery Act** and its implications for Control Risks and our clients. The workshops explain the main features of the act, including the emphasis on 'adequate procedures' to prevent corruption, and the challenges of implementing such procedures. To date, we have held three such workshops at our London head office, and one each in Amsterdam and Berlin. Further such workshops are planned in our other offices.
- **Anti-corruption risk reviews** focusing on high-risk countries to ensure that our local operations are fully in line with the Bribery Act's 'adequate procedures'. The first of these took place in Nigeria in June 2010, when two senior Control Risks consultants spent a week in Lagos and Port Harcourt conducting interviews with our staff. This resulted in a number of recommendations to strengthen our internal controls and training.
- **Anti-corruption training workshops** for staff operating in high-risk areas, such as Nigeria.

Meanwhile, the new framework for leadership and management development will incorporate ethical issues, and reinforce our anti-corruption policies.

## Control Risks' offices

---

**Abu Dhabi**

crabudhabi@control-risks.com

**Algiers**

cralgiers@control-risks.com

**Amsterdam**

cramsterdam@control-risks.com

**Baghdad**

crbaghdad@control-risks.com

**Basra**

crbasra@control-risks.com

**Beijing**

crbeijing@control-risks.com

**Berlin**

crberlin@control-risks.com

**Bogotá**

crbogota@control-risks.com

**Copenhagen**

crcopenhagen@control-risks.com

**Delhi**

crdelhi@control-risks.com

**Dubai**

crdubai@control-risks.com

**Erbil**

crerbil@control-risks.com

**Hong Kong**

crhongkong@control-risks.com

**Houston**

crhouston@control-risks.com

**Jakarta**

crjakarta@control-risks.com

**Kabul**

crkabul@control-risks.com

**Lagos**

crlagos@control-risks.com

**London**

crlondon@control-risks.com

**Los Angeles**

crlosangeles@control-risks.com

**Mexico City**

crmexicocity@control-risks.com

**Moscow**

crmoscow@control-risks.com

**Mumbai**

crmumbai@control-risks.com

**New York**

crnewyork@control-risks.com

**Panama City Technology Facility**

crtechnologies@control-risks.com

**Paris**

crparis@control-risks.com

**São Paulo**

crsaopaulo@control-risks.com

**Shanghai**

crshanghai@control-risks.com

**Singapore**

crsingapore@control-risks.com

**Sydney**

crsydney@control-risks.com

**Tokyo**

crtokyo@control-risks.com

**Washington**

crwashington@control-risks.com