

Communication on Progress 2014



The Global Compact Communication on Progress

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Control Risks and the Global Compact

Control Risks is committed to advocating and implementing the UN Global Compact's principles in all our offices and across our broad spectrum of clients, whether we are working for corporate clients, governments, NGOs or private individuals. As our clients often operate in 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. We work across the world and operate in accordance with shared standards and principles. We employ around 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 - 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 sixth Communication on Progress (COP).

The Compact's anti-corruption and human rights principles are central to our operations at Control Risks. Our report examines the steps we have taken within the company over the last year to help our people address these issues in a robust and consistent fashion, and flags our contributions to international conferences and external publications.

I am pleased to report that since our last COP, all our people have taken part in face-to-face, anti-corruption refresher training, which we have developed over the last year. The training was well received and considered a valuable exercise. We have also provided anti-corruption articles to a range of external publications, and our own quarterly online newsletter *Integrity Matters* now has some 3,500 subscribers; the newsletter reports on international anti-corruption developments and is distributed free of charge.

Our newly-formed global human rights working group has been meeting regularly over the last year. Its first tasks are to review our risk assessment/due diligence processes and to extend our human rights briefing and training programmes. Externally, Control Risks continues to be involved with the adoption of security industry standards and codes of practice which include a focus on human rights. Control Risks attended the launch in Geneva in September 2013 of the Association of the International Code of Conduct for Private Security Providers (ICoCA). Control Risks is a founding member and a Control Risks colleague sits on the ICoCA Board.

Commitment to people is a core value at Control Risks. In terms of the Compact's labour principle, I am happy to report that we have in the last year continued to expand the range of courses available to our people worldwide through our online learning platform, which is proving very popular. A new mentoring framework provides another avenue for our people to develop, allowing them to learn from the experience and expertise of highly talented colleagues across our offices.

I am pleased to report that our environmental initiatives are accelerating. Following the success in the last year of the London-based Regional Environmental Champion and her team of volunteers, a team has been formed in the Dubai office to spearhead a range of environmental initiatives. I look forward to watching their progress in the year ahead. Environmental Champions in our other regions also are making good progress. Whenever we move offices, we have an opportunity to grasp the environmental nettle, and I am impressed by the environmental credentials of our new offices in São Paulo and New Delhi.

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.

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).

Our Human Rights policy makes specific reference to the Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights, 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 its Code of Ethics in its various training programmes. Everyone joining the company is required to read our Human Rights Policy as part of their induction. For teams working in higher-risk environments, we provide more extensive training. Our consultants in Africa, for example, receive a "Human Rights Essentials" briefing document and are required to take an online test to ensure that they fully understand their human rights responsibilities. We have a significant business in Iraq, and all our employees there undergo mandatory annual training which includes the Voluntary Principles. Meanwhile, security management training for our global crisis and security consulting teams includes an emphasis on human rights.

Risk assessment and due diligence

Control Risks includes human rights as an integral part of its internal risk reviews as well as its risk assessment and due diligence consultancy for its clients.

Our Group Risk Manager includes human rights as a specific agenda item when conducting regular reviews of our business teams and international offices.

The Ethics Committee

Our people are encouraged to refer to Control Risks' Ethics Committee if in doubt about the human rights or 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 a new assignment in a sensitive area. 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 inappropriate conduct in relation to human rights or any other ethical issue, and if they feel unable to raise the issue with their line manager. We engage a reputable third party whistleblowing service to ensure independence and anonymity.

Third party complaints

Control Risks' third parties complaints process is included in a policy document that is available on our website. If a third party wishes to make a complaint, it may contact Control Risks management at any of our offices or get in touch with our General Counsel. The policy is required reading for all senior managers.

Activities

Human rights working group

Following our internal review of the company's approach to human rights, and as indicated in our plans in our 2013 COP, we have formed a human rights working group to keep our human rights initiatives on track and to act as a point of contact

within the company. The group has reviewed our Human Rights policy, and is examining how best to extend and strengthen our human rights briefing and training programmes, and structure them to suit the wide range of roles within the company. It is also looking in depth at our risk assessment/due diligence process, with a view to ensuring that this is applied consistently, and is proportionate to the nature and location of an assignment. A member of the group took part in the second UN Forum on Business and Human Rights in Geneva in December 2013.

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 was one of the first signatories of the International Code of Conduct for Private Security Service Providers (ICoC), which establishes human rights-based principles for the responsible provision of private security services. Control Risks became a founding member and attended the formal launch of the ICoC Association in September 2013. A member of Control Risks sits on the ICoC Association Board of Directors. Control Risks is now working towards certification to the PSC1 standard, which will allow us formally to demonstrate that we meet ICoC principles.

In the UK, Control Risks continues to participate in the Security in Complex Environments Group (SCEG), a special interest group within the UK-based industry association the Aerospace Defence and Security Group (ADS).

Plans for 2014-15

In the year ahead, we plan to:

- Enhance our risk assessment/due diligence processes.
- Strengthen our human rights training and awareness programmes.

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.
- We are committed to ensuring that our people are consulted about 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 recognises that the best ideas come from a diverse pool of knowledge, and values the range of backgrounds and experiences that generate such ideas. We understand that open minds lead to mutual respect and ensure openness to change and innovation.
- Control Risks is committed to providing a working environment in which respect for people's dignity is at the core of our organisation. 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 individuals:

- Receive equal treatment in all aspects of engagement with the Company;
- Are not subjected to any form of discrimination or victimisation regardless of sex, race (including colour, nationality, national or ethnic origin), marriage or civil partnership status, pregnancy or maternity, gender reassignment, sexual orientation, age, religion or belief and disability;
- Are not disadvantaged or treated less favourably by a condition or requirement which cannot be reasonably justified.

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 expects them to abide by its policies when working on the company's behalf; the same is expected of agents, representatives, joint venture partners and suppliers.

We continually review our contracts, insurances, policies and procedures to ensure we comply with local legislation.

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 2013-14, we have:

- Continued to develop the use of our online learning platform, by:
 - Issuing a comprehensive global induction programme supplemented by regional face-to-face workshops.
 - Expanding our management development programme, as flagged in our plans in our 2013 COP, giving new managers the training and tools they need. In 2013-14 we supplemented the online programme with regional workshops.
 - Implementing a new Finance for Non Finance Managers programme to equip our employees with a deeper understanding of financial concepts and management.
 - Enhancing the management of compliance training for our people worldwide, as highlighted in our plans for the year ahead in our 2013 COP.
- Developed a mentoring framework available to our people worldwide, as highlighted in our plans for 2013-14.

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. We also seek constantly to improve our employment standards and practices, to ensure that we are consistent in the way we employ and engage people globally.

In 2013-14, we have:

- Refined our global bonus scheme to recognise individual performance still further.
- Implemented guidelines to support our transparent and consistent approach to international assignments within the company, enhancing opportunities for our people to work in different locations.
- Further developed our secure global HR information system. This allows us to manage the information we hold about our people in a consistent way and to meet compliance risks effectively (mentioned in our plans in our 2013 COP).
- Continued to review our global HR insurances to ensure consistency and transparency and to comply with employment regulations in each jurisdiction in which we operate.
- Implemented an Employment Tax policy to ensure that we comply with our tax and social security obligations worldwide.

Plans for 2014-15

In the year ahead we plan to:

- Launch a development programme for our consultants globally, as detailed in our COP plans for 2013-14. Over the last year we have invested significant resources in the programme which is now due to be launched in 2014-15.
- Launch client relationship management programme (CRM) training across our offices.
- Develop cultural awareness training for our people globally.
- Further support compliance activity through our online learning platform.
- Conduct an employee engagement survey.

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 the environmental aspects of our Health, Safety and Environmental policy and includes the following statements:

- Control Risks is committed to protecting the environment.
- Control Risks will comply with all applicable environmental laws and standards in each location where it operates.
- Control Risks has identified three key areas of environmental focus and is committed to monitoring, evaluating and reviewing its performance in these areas across all operating locations.

Areas of focus:

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.
- Control Risks will brief its employees and suppliers on its environmental commitments.
 - Control Risks considers environmental impact a significant risk factor in its risk consulting methodology and will give its clients the best possible advice that is consistent with the environmental responsibilities of the company and of its clients.

The policy also highlights our commitment to the Compact.

Systems

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

A member of the Group Executive Committee sponsors and champions environmental management within the company. The Group Executive Committee reviews the company's progress in our three areas of focus on an annual basis and confirms that these continue to reflect the company's goals.

Regional Directors put in place environmental initiatives for all offices within their region in line with the policy and with local legislation.

Regional environmental champions co-ordinate and promote the company's approach to environmental management in the Control Risks' offices in their region, and submit annual reports outlining their progress in our three areas of focus. The champions work with environmental representatives across our offices.

Control Risks' Charity and Volunteering policy allows our people to spend two days a year, in addition to their holiday allowance, engaging on a voluntary activity, project or charity that can include the environment.

Our Environmental policy is included in our global induction programmes for people joining the company.

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

Activities

The Group Executive Committee in July 2014 reviewed and confirmed our Environmental policy, and our three areas of environmental focus (see below). With around 30% of our permanent staff based in our London office, we recognise that environmental management enhancements achieved in this office will have a considerable impact.

1. Reducing workplace waste.

Our offices measure energy consumption wherever they can and record the results. We can report that consumption has dropped by 8% in our India offices over the last two years. Meanwhile, consumption in some of our other Asia Pacific offices has increased by more than 10% over the last year. We will keep this under review. Consumption fell to 152,965 kwh in our London office, where the figure has been falling every year since 2011 (when it stood at 164,424 kwh).

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. Our India and Dubai offices have increased their number of recycling categories since our last COP.

We also record our recycling achievements. In a recent recycling drive, our Americas IT team disposed of 16 laptops, 15 keyboards, 12 monitors, six desktops, five docking stations, four servers and two printers in an environmentally-friendly way. With all new items EnergyStar rated, the region's energy consumption will be reduced despite the recruitment of additional employees and the corresponding use of extra equipment.

Meanwhile, over the last year our London office has run a recycling awareness campaign, installed additional recycling bins and issued mugs to replace paper cups, which are being phased out. In Dubai, the office is planning a lively campaign to ensure the success of a new initiative to minimise printing.

2. Shrinking greenhouse gas output.

- **Travel.** The nature of Control Risks' business and the fact that we have offices worldwide mean that travel cannot be avoided. However, an upsurge in the use of an online instant messaging, video conferencing and a screen sharing platform for internal purposes has led to a marked reduction in travel. In order to reduce travel, the company also uses audio, web, video and event conferencing for external communications, meetings, marketing and training purposes, as well as for consulting.

We are unable to record our travel miles for all our offices but we are pleased to report that overall figures for London indicate that we reduced CO2 emissions by 12.4% in 2012, a further 22% in 2013, and a further 16.9% to date in 2014. The London office has in the last year also provided additional support for people cycling to work by providing more secure bicycle parking.

Meanwhile, although our India and Beijing offices have reduced their travel miles over the last two years (by 17% and 70% respectively), our other offices in our Asia Pacific report an increase in travel. The Regional Champion will be exploring how we can improve our record. In Dubai, our travel agents have been asked to track the air miles and CO2 emissions for air travel undertaken by our growing team there.

- **Offices.** Control Risks seeks to influence the management of our office buildings globally to optimise energy efficiency. Relocation provides an opportunity to introduce environmental enhancements, and our offices in São Paulo and New Delhi have been able to do just that since our last COP.

In planning the design of our new, larger office space in New Delhi our team achieved its goals of using environmentally friendly material for the construction and interiors, minimising electricity consumption and reducing workplace waste. Highlights included the installation of individual air conditioning units, which can be turned off when not in use, LED lights, recycled workstation tabletops and low VOC (Volatile Organic Compound) wall paint. Meanwhile, all paper-based waste will be collected by a supplier who will in return provide recycled stationery and plant a tree for every 100kg of waste collected from us.

Our new office space in São Paulo is also fitted with energy-saving appliances and equipment. Individual units in the new building each have electricity demands of 28.32kW, and the power is initially of medium tension and is then converted to low tension, increasing efficiency and resulting in reduced power consumption.

In the Americas, the growth of our Legal Technologies business has doubled our need for data storage. But, by setting up environmentally-conscious and energy-efficient data storage solutions, we have nearly doubled our capacity while reducing the overall power draw. In addition, we have replaced the region's older high-power server-based firewalls with purpose-built firewall appliances, thereby cutting power and cooling by 20% at the same time as increasing capacity.

3. Promoting environmental sustainability

As highlighted in our plans in our 2012 COP, we have now undertaken an environmental audit of our London office, where we have 300+ people. The audit covered utilities, recycling, printing and use of paper, disposal (WEEE compliance) and transport. The audit identified a number of actions to help reduce our impact on the environment, and many have been implemented.

As planned in our 2013 COP, we have run a successful campaign to raise awareness of our environmental initiatives in our London office.

We are continuing to identify the environmental policies and practices of our suppliers and contractors as we wish to ensure that these meet best practice.

Plans for 2014-15

In the year ahead, we plan to:

- Expand our eco audit and environmental awareness programmes across our offices, and encourage collaboration between Regional Champions to promote a global approach.
- Run an awareness event in our London office to raise the profile of our environmental champions, their role and current initiatives, encouraging others to contribute and promoting the environmental volunteering scheme.
- Reduce paper consumption by 15% in our London office.
- Reduce electricity consumption by 5% in our London office.
- Explore the introduction of car pooling in our Dubai office.

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), 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.

Systems

Internal training and awareness-raising

Our Anti-Bribery and Anti-Corruption policy features in our internal training for our employees at all levels. All employees are required to complete an e-learning programme as part of their induction when they join the company. This includes an anti-bribery and anti-corruption module which was designed for Control Risks.

In 2014, as highlighted in our plans in our last COP, we designed and implemented a face-to-face, anti-corruption refresher course. This four-part course, which takes around 90 minutes to complete, combines a briefing with discussion scenarios focusing on common dilemmas such as demands for facilitation payments during immigration procedures. The first part summarises our anti-bribery commitments as defined by our own policy as well as our international legal obligations, and subsequent parts focus on "resisting pressure", "working with intermediaries" and "winning business". Course sessions were presented by senior members of the company, and all employees were required to take part.

Third parties and subcontractors

Control Risks' Anti-Bribery and Anti-Corruption policy states that we do not pay bribes directly or indirectly, and that we expect business partners to adhere to integrity principles that are consistent with our own. These principles apply with particular force to commercial agents, representatives and subcontractors.

As reported in our 2013 COP, we introduced a new Subcontractor Management policy together with accompanying procedures in June 2013. The policy states that: "The selection, preparation, engagement, training and management of subcontractors must be conducted in such a way as to minimise the risk of illegal, unethical or unprofessional behaviour".

The procedures provide for rigorous due diligence when we hire new sub-contractors. Control Risks employees responsible for managing subcontractors are required to brief them on Control Risks' ethics policies, and to include an anti-bribery clause in the business contract. Existing subcontractors have been subject to an additional vetting process to supplement our earlier due diligence reviews, and this process has now been completed.

We also took the opportunity, during the internal face-to-face- training sessions, to reinforce the existing requirement in our policy for due diligence to be conducted prior to engaging any third parties for support in business development activities.

Suppliers

As mentioned in our 2013 COP, we are developing guidance for employees on screening suppliers and other third parties (excluding subcontractors) with an emphasis on anti-bribery and anti-corruption compliance.

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. 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".

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.

Activities

Thought leadership

- Special report on *International Business Attitudes to Corruption 2014*

Our latest report in the *International Business Attitudes to Corruption* series is due for release in October 2014. This is based on a global survey of more than 600 respondents, mainly in-house lawyers. The report will discuss the latest trends in anti-corruption compliance as well as remediation measures. The report will be publicly available.

Our previous survey in the series, in 2013, was widely reported in the mainstream news media and specialist publications, such as the November 2013 edition of *Nutshell*, the newsletter of the Global Compact Network India.

- Other 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 3,500 subscribers across the world. For example, the July 2014 edition included news and analysis of developments in China and India, as well as a feature article on the role that corruption has played as a driver of recent unrest in Egypt, Thailand, Brazil and Turkey, and an update on UK enforcement.

In May 2014, we published a report on *Grey Practices: Fuelling Fraud and Corruption in the Indian Business Environment*. The report, which is available on Control Risks' website, was launched at events in Singapore, Hong Kong, Delhi and Mumbai, and widely reported in Indian media outlets such as the *Economic Times*, *the National* and *Asian Age*.

We have in the last year also produced a series of analytical reports – likewise distributed free of charge – on corruption in the maritime sector, looking at recent trends in the ports of Africa, Latin America and Europe.

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

- Contributions to external publications

Control Risks staff members frequently contribute to external publications – including the print, online and broadcast media – on topics relating to business integrity. Examples in 2013-14 include contributions to *Forbes.com* on Canadian anti-corruption enforcement (February 2014), and on the role of corruption in fuelling popular protest movements (June 2014); the changing anti-corruption compliance environment for *Inside Counsel* (June 2014); and on anti-corruption compliance and enforcement trends in China for the *Shanghai Business Review and the China Economic Quarterly* (June 2014).

In Brazil, Control Risks has contributed a chapter on corruption risk assessment in the forthcoming book, *Compliance with Anti-Corruption Law*, which will be published in late 2014.

- Participation in anti-corruption conferences and seminars

Control Risks contributes to anti-corruption conferences around the world. In 2013-14 examples include contributions to the Second Forum on Anti-Corruption Australia (March 2014), the In-House Congress Jakarta (April 2014), Mitigating Bribery and Corruption Risks in Emerging Markets (Hong Kong Society of Financial Analysts, April 2014), the General Counsel Conference (New York, June 2014), and the Latin America Ethics Summit (São Paulo, July 2014).

- Civil society initiatives

Control Risks' London head office is an active member of the Transparency International (TI)-UK Business Integrity Forum, and our offices in Berlin and Sydney are corporate members of the TI chapters in Germany and Australia respectively.

In China, our Shanghai office worked with the American Chamber of Commerce (AmCham) on the China Business Report 2013-2014. The report is based on a survey of 399 AmCham member companies and included a series of questions on anti-corruption and compliance in its section on the business environment. For example, when asked to define the areas of corruption that concerned them most, 55% of respondents cited “pressure to give sales kickbacks to customers”. The report is publicly available on the AmCham website.

In Brazil, São Paulo-based Senior Managing Director Geert Aalbers was a member of a team of lawyers who took part in a panel discussion with members of the OECD Working Group on Bribery who visited the country in May 2014. They were conducting the “Phase Three” examination of Brazil’s fulfilment of its obligations under the OECD Anti-bribery Convention.

Plans for 2014-15

In the year ahead we plan to:

- Review and run anti-bribery and anti-corruption refresher courses as appropriate worldwide.
- Complete the development of our guidance for employees on screening suppliers and other third parties (excluding subcontractors), with an emphasis on anti-bribery and anti-corruption compliance.

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