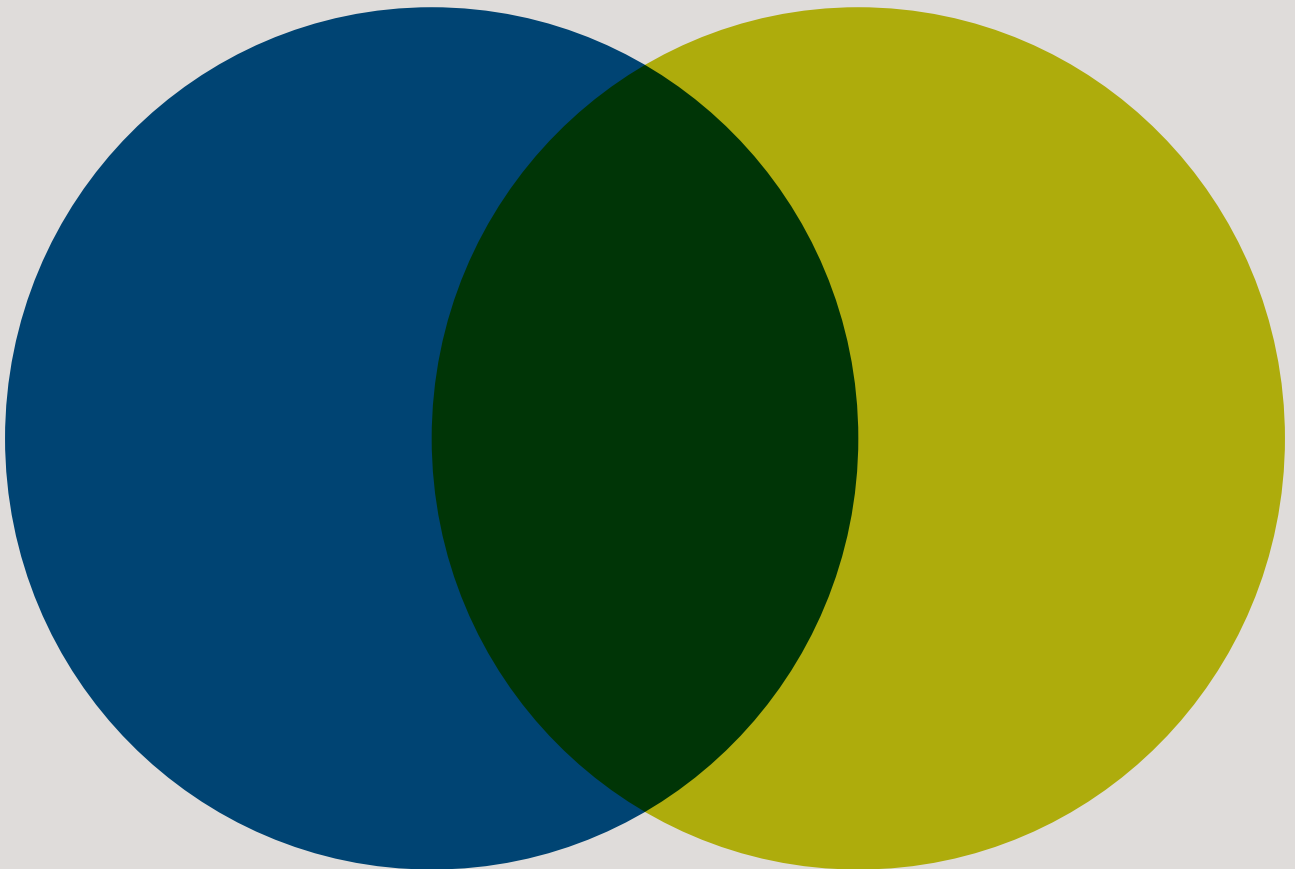




**United Nations Global Compact
SWIFT Communication on Progress**

2015 Report



**Statement
of continued support by
the Chief Executive Officer**

Dear Stakeholders

In October 2012, SWIFT committed to support the **Ten universally accepted Principles** of the United Nations Global Compact with respect to human rights, labour standards, environmental protection and anti-corruption, and to advance those principles within our company.

Since the publication of our last Communication on Progress, we took a series of practical actions, with global campaigns focused on:

- the environment and targeting to become carbon-neutral by 2020,
- diversity with a focus on gender equality,
- a review of the sustainability obligations of our suppliers and CSR partners,
- well-being at work with a focus on health and psycho-social risks, and
- enhancing our Anti-Corruption and Anti-Bribery policies and related training tools.

These actions and their results are described in more detail in this Communication on Progress.

We are pleased to confirm our continued support for the Global Compact and renew our ongoing commitment to the initiative and its principles.

Sincerely,
Gottfried Leibbrandt
Chief Executive Officer
SWIFT

Human Rights

PRINCIPLE 1

Businesses should support and respect the protection of internationally proclaimed human rights.

PRINCIPLE 2

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

Measurement of Outcome

No human rights violations were reported in the various available reporting channels in 2015

Code of Conduct

SWIFT's Code of Conduct embodies three principles: trust, integrity and ethics. The Code of Conduct encourages all employees to report any deviations from the Code of Conduct to management, HR and/or the Chief Compliance Officer.

SWIFT requires all employees to formally acknowledge the Code of Conduct when they join the company. Executive and senior managers, as well as staff in commercially sensitive positions at SWIFT are required to periodically confirm their compliance with the Code of Conduct in writing.

Since 2014 the Code of Conduct is reviewed on an annual basis.

In order to ensure awareness of the Code of Conduct, SWIFT has introduced an auditing tool that tracks employees' acknowledgement of the Code of Conduct.

It is mandatory for staff to take part in a new interactive awareness training module before they acknowledge the Code of Conduct. As part of the training tool staff must also take part in a test. Staff must reach a score of 90% of right answers in that test in order to pass and to be able to acknowledge the Code of Conduct.

Sustainability Obligations

In 2015 SWIFT further extended the sustainability aspects of its contractual framework with its suppliers.

The new CSR Sustainability Obligations chart informs suppliers and CSR partners about their obligations with regards to human and labour rights, the environment, anti-corruption and anti-bribery, when supplying to or partnering with SWIFT. SWIFT also requests that its suppliers' sub-contractors meet those same obligations.

SWIFT's new Sustainability Obligations are now systematically included in all RFPs and contractual agreement revisions with suppliers and CSR partners.

Committees

Where applicable, SWIFT has set up Works Councils and Health and Safety Committees that include staff and management representatives. Although broad in terms of topics and governance, these bodies can and will discuss relevant human rights related topics when brought up.

Trusted persons

At SWIFT's largest office location, its global headquarters in Belgium, a system of trusted persons has been introduced. It further facilitates reporting of issues related to human rights.

Public statements

For more information about SWIFT's human rights principles, respect for diversity and social responsibility please visit www.swift.com.

Labour

PRINCIPLE 3

Businesses 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.

PRINCIPLE 6

The elimination of discrimination in respect of employment and occupation.

Social Bodies

At SWIFT all employees may engage in social bodies as permitted by local laws and regulations. Where applicable, SWIFT management organises and participates in these social bodies and engages in dialogue and/or collective bargaining.

SWIFT organises regular Works Councils, Union Representative Meetings, and Health and Safety Committee Meetings at its largest office location (Belgium HQ). A Works Council has also been set up at SWIFT's operating location in the Netherlands. At SWIFT's other locations, other means referenced in the below policies are used to ensure open dialogue and follow up any filed labour reports.

Labour Rights Policies Visibility

Labour rights related policies are available and accessible to all employees covering:

1. SWIFT's Management Principles, which focus on the treatment of and respect for people. As part of the 2014 Management Principles revision, a company-wide employee management feedback mechanism was introduced.
2. SWIFT's Diversity and Inclusion Strategy with three focus areas (gender, age and culture), which was developed in 2014, and is now being implemented globally (see below).
3. SWIFT's Equal Opportunities Policy, which outlines key elements to ensure equal treatment of people.
4. SWIFT's Open Door Policy, which invites any issues to be escalated and followed-up (including labour and human rights).

Diversity & Inclusion

Awareness sessions on diversity and inclusion were organised at SWIFT's offices around the world in Q4 of 2015. They highlighted SWIFT's Diversity and Inclusion Strategy, achievements, and key insights on the topic from SWIFT's annual Sibos conference. SWIFT is planning a Diversity Day to take place in Q1 of 2016, as well as various other awareness events to focus on the three dimensions of gender, generation and culture.

In 2015 SWIFT held Unconscious Bias sessions at four of its locations around the world. In 2016, 12 additional sessions will be organised to train SWIFT's people managers. As of 2017, this training module will become mandatory for all newly appointed managers.

In 2016 SWIFT will launch Balance@SWIFT, an internal network focusing on gender diversity.

SWIFT has set itself a target to have at least 33% female people managers by 2020. Performance against that target will be tracked at Board level. A company-wide Key Performance Indicator (KPI) on external hiring of women will be tracked on a quarterly basis at executive level.

SWIFT's CSR department provides financial support for projects in developing countries related to micro-finance and financial inclusion, as well as education for women and girls in business and sciences.

GlobeSmart, a global awareness campaign on cultural diversity, was made available to all SWIFT staff.

Measurement of Outcome

No reports of violations of labour rights were received in 2015. In 2015 SWIFT delivered training and awareness sessions related to diversity and well-being at all its offices worldwide. Two Key Performance Indicators covering gender diversity are tracked at executive or Board level on a quarterly basis.

Health & Safety

All SWIFT employees worldwide were invited to participate in SWIFT's 2015 Well-being Week.

SWIFT is preparing to carry out a Well-being Survey in 2016.

A psycho-social risk analysis of SWIFT staff was carried out in 2015 and was followed up with global and team-specific action plans by the company's HR division. In 2016 a burn-out prevention training programme will be launched for all people managers and employees.

At global level, SWIFT is aligning its offices' health and safety efforts with best practice.

In 2015 SWIFT carried out a regulatory audit on Health and Safety at its headquarters. Several follow-up measures are planned for 2016.

A new e-learning module on ergonomics was made available to all SWIFT employees in 2015.

Sustainability Obligations

Through its new Sustainability Obligations chart SWIFT requires its suppliers and CSR partners, as well as their sub-contractors, to recognise freedom of association; prohibit forced, bonded or compulsory labour; abolish child labour; maintain safe and healthy work environments; prohibit unlawful discrimination; ensure fair working hours, weekly rest and fair wages.

Children & Education

SWIFT's CSR department provides financial support to organisations such as Teach for All and SOS Children's Village, with a special focus on education for disadvantaged children.

Environment

PRINCIPLE 7

Businesses should support a precautionary approach to environmental challenges.

PRINCIPLE 8

Undertake initiatives to promote greater environmental responsibility.

PRINCIPLE 9

Encourage the development and diffusion of environmentally friendly technologies.

New Environmental Policy

In 2015, SWIFT introduced a new Environmental Policy that confirms its ambitious new goal to become carbon neutral by 2020.

Carbon emissions

SWIFT successfully reduced its CO2 emissions by 70% between 2007 and 2014, one year ahead of target.

SWIFT has set an ambitious new goal to become carbon neutral by 2020. Carbon reduction measures are being implemented in the areas of energy efficiency of buildings and data centres, by: limiting staff travel and commuting-related emissions, waste sorting and waste reduction campaigns, using renewable energy wherever feasible, promoting staff and contractors' environmentally-friendly behaviour, implementing a sustainability policy with SWIFT's suppliers and CSR partners, protecting biodiversity at SWIFT's premises and beyond, and compensating for carbon emissions when they are unavoidable.

Data centres & office buildings

SWIFT continued to reduce CO2 emissions caused by its data centres (3% reduction since 2013). SWIFT achieved this by reducing electricity consumption and using electricity produced from renewable sources at its operating centre in the Netherlands. Additional measures were taken at SWIFT's US and Swiss operating centres to improve their internal airflow. For our US data centre, we constantly monitor for the availability of electricity produced from renewable sources.

In 2015 SWIFT expanded its hot desking programme to more offices, which has allowed SWIFT to further rationalise use of office space and control electricity consumption while staff numbers grow.

SWIFT is planning to introduce the following additional measures: energy efficiency improvements by regulating airflow at offices during low occupancy periods and by making further improvements to airflow, temperature and humidity controls in server rooms.

Events

Travel emissions caused by SWIFT employees and invitees to SWIFT events are compensated by SWIFT by buying green certificates.

Environmental criteria are included in the location selection process for Sibos, SWIFT's largest annual conference. SWIFT encourages Sibos exhibitors to take actions to reduce their environmental impact.

At Sibos Singapore in 2015 SWIFT had an-almost paperless stand. The stand was partially made from repurposed furniture, electric fittings, wiring and audio-visual equipment, and used environmentally friendly materials. Following the conference, some of the SWIFT stand furniture was donated to local associations. SWIFT's Health Corners at Sibos served organic & fairtrade coffee and displayed a digital-only exhibition manual, which contained a chapter outlining SWIFT's greening guidelines.

Measurement of Outcome

SWIFT has published a new Environmental Policy and reduced carbon emissions by 70% between 2007 and 2015. SWIFT set a target to become carbon neutral by 2020. The company car fleet now includes 23 electric cars and SWIFT has bought 30 new electric bicycles. SWIFT won a bicycle-mobility prize in Belgium. The biodiversity programme supported the planting of 27,000 trees.

e-cars & e-bikes

In May 2015, the first 21 electric company cars were delivered to SWIFT's company car fleet. 21 charging stations were installed at SWIFT's headquarters in Belgium and 4 at SWIFT's operating centre in the Netherlands. In 2016, SWIFT will add 10 more charging stations in the Netherlands. In addition, more and more employees are opting for plug-in hybrid vehicles. At SWIFT's US data centre, 8 charging spaces were created this year.

SWIFT's average CO2 company car emissions have reduced from 141 grams per km in 2011 to 118 grams per km in 2015 (-16%).

At our headquarters in Belgium, SWIFT bought 30 new e-bikes (compared to 20 e-bikes in 2014) to encourage low carbon local mobility.

In Belgium SWIFT won the 'Tous Vélos Actifs' 5-star label again, in recognition for the proactive and innovative policy to promote commuting by bicycle.

Biodiversity

SWIFT financed the planting of 27,000 trees in Brazil, Tanzania and Kenya.

Three beehives at SWIFT's headquarters produced 100kg of honey (compared to 65kg in 2014). The proceeds of the honey sale to employees were donated to local associations dedicated to the protection of bees.

SWIFT's flower meadow and a conservatory orchard remain an integral part of its biodiversity programme.

Awareness & Behaviour changes

Regular awareness sessions and campaigns are being carried out to encourage environmental behaviour among staff.

In addition to the car and bicycle campaigns in 2015, SWIFT encouraged staff to use the stairs instead of elevators, to limit the use of plastic cups for onsite drinks consumption, and to correctly sort waste.

Anti-corruption

PRINCIPLE 10

Businesses should work against corruption in all its forms, including extortion and bribery.

Measurement of Outcome

No reports of corruption or bribery were filed through the available channels at SWIFT in 2015. The completion of the mandatory e-learning modules is being monitored.

Code of Conduct

Anti-corruption and anti-bribery are an integral part of SWIFT's Code of Conduct.

The Code of Conduct, including its anti-corruption and anti-bribery section, was reviewed in 2015.

Anti-Corruption & Anti-Bribery Policy

The Code of Conduct also refers to SWIFT's Anti-Corruption and Anti-Bribery Policy which sets out expected behaviour and reporting processes. The policy reiterates SWIFT's commitment against corruption and bribery, as set out in the Code of Conduct, and implements applicable anti-corruption and anti-bribery laws.

SWIFT's Anti-Corruption and Anti-Bribery Policy applies to all SWIFT staff and to all persons acting on SWIFT's behalf (contractors, temporary staff, agents and partners) around the world.

SWIFT's Anti-Corruption and Anti-Bribery Policy was reviewed in 2015. SWIFT launched new interactive e-learning modules on the Code of Conduct and the Anti-Corruption and Anti-Bribery Policy, which became mandatory for all staff in 2015.



SWIFT is a member-owned cooperative that provides the communications platform, products and services to connect more than 10,800 financial institutions and corporations in more than 200 countries and territories. SWIFT enables its users to exchange automated, standardised financial information securely and reliably, thereby lowering costs, reducing operational risk and eliminating operational inefficiencies. SWIFT also brings the financial community together to work collaboratively to shape market practice, define standards and debate issues of mutual interest.

For more information about SWIFT, visit www.swift.com.