



Communication on Progress 2011

October 17, 2011

Dear United Nations Global Compact,

CODE Incorporated is once again committed to supporting and enacting, within its sphere of influence, the values outlined in the United Nations Global Compact. CODE Inc. intends to undertake and promote responsible actions pertaining to human rights, labour rights, the environment and anticorruption within the company and on the part of the partners and affiliates with which CODE Inc works.

CODE Inc. intends to continue to comply and adhere to the principles of the United Nations Global Compact program by creating practical solutions to contemporary problems related to globalization. The CODE Inc. Senior Management and staff fully support the actions the company is taking to work towards sustainability goals – in particular those contained in the United Nations Global Compact. We endorse the priorities and targets set out in our report. CODE Inc. recognizes, partakes, and benefits from the global economy and intends to do its part as an organization to support the advancement of broad-based development and sustainable markets, globally.

Yours truly,

A handwritten signature in dark ink, appearing to read "M. Cauvier", is written over a light blue circular stamp.

Maryline Cauvier,
President & CEO

Reporting on sustainability is essential to the development of a healthy, robust business. The CODE Inc. Board supports the sustainable development components that CODE Inc. has implemented for the benefit of global economic growth.

Map of Our Experience



Afghanistan
Albania
Antigua
Armenia
Azerbaijan
Belize
Benin
Bosnia
Bulgaria
Burkina Faso
Cambodia
Canada
Chad
Comoros
Congo
Congo (DRC)
Djibouti
East Timor

Ethiopia
Falkland Islands
The Gambia
Georgia
Ghana
Grenada
Guinea Bissau
Guinée, Conakry
Guyana
Haiti
Iraq
Ivory Coast
Jamaica
Kenya
Lesotho
Liberia
Madagascar
Malawi

Maldives
Mali
Mauritania
Micronesia
Morocco
Montenegro
Mozambique
Nicaragua
Nigeria
Palestine
Rwanda
Sao Tome & Principe
Sierra Leone
St. Lucia
St. Vincent & the
Grenadines
Sudan
Sweden

Switzerland
Tanzania
Uganda
Ukraine
United States
Vanuatu
Venezuela
Yemen
Yugoslavia
Zambia
Zanzibar

Clients

CIDA
IAPSO
IECI
IFES
IOM
OSCE
USAID

UNAMA
UNAMET
UNDP
UNOPS
UNHCR
UNTAET
UNTAC

Over 35 National Electoral Commissions



United Nations Global Compact 2011

The Communication on Progress (COP) is an essential component of the United Nations Global Compact. The Global Compact is structured around global sustainability in four key domains: Human Rights, Labour Rights, the Environment, and Anti-Corruption. The following principles have been adopted as guidelines for organizations which share the Global Compact's main objectives.

Human Rights

- Principle 1. Business should support and respect the protections of internationally proclaimed human rights.
- Principle 2. Business should make sure that they are not complicit in human rights abuses.

Labour Rights

- Principle 3. Business should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 4. Business should uphold the elimination of all forms of forced and compulsory labour.
- Principle 5. Business should uphold the effective abolition of child labour.
- Principle 6. Business should uphold the elimination of discrimination in respect of employment and occupation.

The Environment

- Principle 7. Business should support a precautionary approach to environmental challenges
- Principle 8. Business should undertake initiatives to promote greater environmental responsibility.
- Principle 9. Business should encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

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

Human Rights Issues

Commitment:

CODE Inc. continues to encourage Gender Equity through corporate example and the pursuit of business initiatives that focus on the development of women.

Commitment:

Ensure that CODE Inc. is in good standing with all Human Rights Laws

<i>Policies</i>	<i>Performance</i>
CODE Inc.'s policy is to promote gender equity among its staff and Board of Directors.	<ul style="list-style-type: none">• The Code of Ethics and Business Conduct, which all employees are issued, guides employees on values & behavior collectively supported by CODE Inc.• CODE Inc. Board of Director's supports equal representation of men and women on the Board as a guide & example that CODE Inc. demands equal opportunity & rights for women.
CODE Inc. is committed to positive progress by supporting initiatives that support the development of women and equality for all.	<ul style="list-style-type: none">• CODE Inc. works primarily to support democracy in the developing world. Democracy cannot truly exist without equal voter representation by men and women.• CODE Inc. operates in developing nations & is vigilant of generating new ways to support nations in need.

Labour Rights Issues

Commitment:

CODE Inc. respects, adheres to, and exceeds expectations of all labour laws set forth by Domestic and International Governments and Tribunals.

Commitment:

CODE Inc. will undertake ongoing assessments of the business practices of overseas clients to ensure that the labour rights of their employees are respected.

Commitment:

CODE Inc. embraces responsibilities in respect to the well-being of its employees.

<i>Policies</i>	<i>Performance</i>
CODE Inc. operates internationally and is involved with manufactures around the world. In the course of conducting business in 'high risk' areas we work to ensure that we are not complicit in human rights abuses. If we were to find ourselves unintentionally implicated in an abuse we are committed to correcting the situation immediately.	<ul style="list-style-type: none">• CODE Inc. operates by complying to and supporting international standards set forth to protect human rights.• Our Code of Ethics and Personnel policies describe the standards we set for ourselves and clients. <p>CODE Inc. advocates to our overseas contacts the importance of the United Nations Global Compact and how they too can become involved to promote positive global sustainability, with an emphasis on the human rights component.</p>

<p>CODE Inc. supports it's shareholder CODE with an annual donation to support the development of literacy and education.</p>	<ul style="list-style-type: none"> • CODE Inc. is pursuing new business initiatives that align with CODE development values. • CODE Inc. aligns its values with those of it's parent organization CODE: empowering development, education and literacy.
<p>CODE Inc. meets and exceeds applicable employment standards set forth by both Provincial and Federal Legislation.</p>	<ul style="list-style-type: none"> • CODE Inc. is committed to its employees, our commitments are outlined in the Personnel Policy. <ul style="list-style-type: none"> • CODE Inc. complies to all international labour standards when conducting business overseas.
<p>CODE Inc. recognizes that our key asset is our people and therefore is committed to going beyond providing fair, flexible, appropriate remuneration and benefits to all employees.</p>	<ul style="list-style-type: none"> • The health and safety rights and policy is outlined in our Health and Safety document. • A Violence and Harassment Policy (2010 & 2011 revised edition) has been created in addition to our H&S policy to further ensure all possible situations are fully covered by policy to reduce risk. • A procedure and policy manual is in place for employees to reference any concerns. CODE Inc. offers assurance to it's employees by providing a health and benefits plan.

<ul style="list-style-type: none"> CODE Inc. ensures that all employees have the necessary training to allow them to work safely. 	<p>CODE Inc. ensures that all employees meet yearly renewal of Workplace Hazardous Materials updates. (WHIMIS) (2011)</p>
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Environmental Issues

Commitment:

CODE Inc. views environmental issues with great importance. The CODE Inc. organization supports eco-friendly practices within its organization.

Commitment:

To lessen the waste created by the CODE Inc. organization.

<i>Policies</i>	<i>Performance</i>
CODE Inc. supports corporate environmental responsibility and is primarily focused on its ability to better the environment by balancing office energy efficiency.	<ul style="list-style-type: none"> CODE Inc. has revised its policy on environmental well being pertaining to the work place. The revision encourages the company to consciously practice environmental sustainability. CODE Inc. takes a precautionary approach to environmental issues encouraging carbon neutrality and lessened energy and water consumption within its offices. Included this year (2011) is a water filtration system that has eliminated the use of

	<p>water bottles within the organizations. Glasses have also been provided to staff.</p> <ul style="list-style-type: none"> • A composting program has been initiated. (2011)
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<i>Policies</i>	<i>Performance</i>
CODE Inc. believes that corporate environmental sustainability begins with ensuring that eco-friendly practices are in place when conducting business.	<ul style="list-style-type: none"> • When conducting business in areas of little infrastructure CODE Inc. realizes it is essential to deliver a product that is reusable, thus ensuring that minimal waste is created. • CODE Inc. respects environmental emissions concerns and ensures that it's manufacturers provide safe, recyclable plastics when producing ballot boxes.
CODE Inc.'s environmental policies are aligned to international standards and apply these policies when conducting international business.	<ul style="list-style-type: none"> • CODE Inc. supports the environmental policies outlined by the Canadian Government; and adheres to the recommendations set forth by the Canadian Government on sustainable corporate environmental practices.
CODE Inc.'s preferential mode of transportation is ocean freight when timing and logistics permit.	<ul style="list-style-type: none"> • CODE Inc. has opened offices in Europe in order to source products closer to our main client base to encourage shipment by ocean freight

	<p>and lesson CODE Inc.'s carbon footprint.</p> <ul style="list-style-type: none"> • We espouse the virtue of surface transport not only from a financial perspective but as a more eco-friendly mode of transportation.
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Anti Corruption Issues

Commitment:

CODE Inc. is compliant with all International and National reporting standards.

“We believe that openness and transparency are the most important levers for improving our performance. Our commitment to ‘deliver the vote’ will be enhanced by the new sustainable development policies applied by CODE Inc.”

<i>Policies</i>	<i>Performance</i>
Ensures that all CODE Inc. employees are aware of and understand the CODE Inc. policy on ethics.	<ul style="list-style-type: none"> • CODE Inc. has strong internal policies about expectations of ethical and professional behavior which is communicated to staff. • The CODE Inc. Code of Conduct is available to all CODE Inc. staff.
CODE Inc. prides itself on maintaining high standards of corporate governance and open communication systems to emphasize the integrity of the company.	<ul style="list-style-type: none"> • CODE Inc. operates an open communication system with employees; therefore, if any material issues arise they are reported to Senior Management,

	<p>and if need be, taken up with the Governance and Policy Committee.</p> <ul style="list-style-type: none"> • How CODE Inc. manages our Code of Conduct is described in Governance and Policy Report.
CODE Inc. avoids all corruption pertaining to the nature of it's core business: democracy and electoral supplies.	<ul style="list-style-type: none"> • In order to guarantee that extortion or bribery do not take place CODE Inc. strives to mainly conduct business with the UN when dealing with countries that have questionable reputations.

For further information, or if you have any questions or comments, please contact Keely Brach at keely@codeinc.com