

2012 Communication on Progress

Participant

- [Erinys Holdings Limited](#)

Published

- 2012/04/01

Format

- Stand alone document

Time period

- 4/2011 to 3/2012

Self-assessment

- Includes an explicit statement of continued support for the UN Global Compact and its ten principles
- Issue areas covered: Human Rights, Labour, Environment, Anti-Corruption

To Whom It May Concern:

ERINYS COMMITMENT TO SUPPORT THE UN GLOBAL COMPACT

The Erinys Holdings Board of Directors wishes to re-affirm its commitment to the Ten Principles of the UN Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption . Erinys' commitment has been woven into all aspects of the Company's daily operations, culture and strategy and further enshrined in our revised Code of Conduct, which provides detailed guidance to both Erinys' management and personnel working under their direction.

JONATHAN GARRATT

Chief Executive Officer

Erinys Holdings Limited

HUMAN RIGHTS

Assessment, policy and goals

Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments and company goals on Human Rights.

Erinys has recently updated its Code of Conduct wherein specific reference has been made to the Ten Principles of the UN Global Compact as included within the Guiding Principles of the document.

Erinys exercises a zero tolerance policy in any activities that contravene its Code of Conduct, which explicitly includes the Ten Principles. All business activities are monitored by the Erinys Management Board to ensure they fully comply with the demands of the Erinys Code of Conduct. In many instances, Erinys also has to comply with stringent Human Rights policy demands of its clients.

Erinys will not engage in any business dealings with organisations, entities or individuals who have been found in breach of international human rights or humanitarian law.

Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

Erinys policies on upholding Human Rights are set out in detail in the Company's Code of Conduct. In this document, the Legal Framework is described as follows:

‘As a supporter of the United Nations Global Compact and as an International Code of Conduct (ICoC) Signatory Company, Erinys operates in accordance with the provisions of the following:

- *The International Code of Conduct for Private Security Services Providers*
- *The Ten principles of the UN Global Compact*
- *Voluntary Principles on Security and Human Rights ‘*

Company policy requires that all employees are given Code of Conduct induction training on joining Erinys, and refresher training every six months thereafter.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

Code of Conduct training covering all aspects of the Ten Principles is recorded on personnel records.

As a signatory company of The International Code of Conduct for Private Security Services Providers (ICoC), the reporting of Abuses by Third Parties is a requirement.

In the past year Erinys has not been subject to any investigations, legal cases or incidents involving Human Rights violations.

LABOUR

Assessment, policy and goals

Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.

Labour rights are set out in the Erinys Code of Conduct, and in the Erinys Disciplinary Code.

All Erinys employees have their rights and contractual obligations clearly explained to them and detailed in their contract of employment.

It is the Company's policy to ensure that all employment has legally compliant contractual underpinning.

Implementation

Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.

Management at all levels is responsible to the Erinys Board of Management for implementing the Company's labour and related policies.

All employees are subject to regular Health and Safety training and briefings, and compliance is entered on individual training records.

The Company's Health & Safety Policy clearly outlines responsibilities, accountabilities and procedures to ensure the health and safety of employees.

Erinys has a well established Redress of Grievance policy and mechanism.

Erinys values good labour relations and ensures that continuous communication is maintained with employee representatives. Quarterly meetings with labour- elected representatives are held to address any social issues.

The Code of Conduct clearly outlines the prohibition and seriousness of – Sexual Exploitation, Human Trafficking & Forced Labour and Child Labour.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

The Health & Safety Policy includes audits and reporting to Senior Management.

It is the duty of management to investigate breaches against the Company's labour policies, and if necessary refer these to the relevant external agencies.

The Erinys Management Board is updated monthly on labour related disputes, and their resolution.

Erinys has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Compact Labour principles, in this reporting period.

ENVIRONMENT

Assessment, policy and goals

Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.

Erinys policy and commitment to the protection of the environment is set out in the Company's Policy on the Environment. The Environmental Statement has recently been revised and further incorporated in the revised Code of Conduct.

Implementation

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

Environmental Awareness training is included as part of regular Health & Safety at work training and is incorporated into the Company's management procedures.

Given the inherent risks of operating in complex environments, Erinys takes its environmental health and safety responsibilities very seriously. The precautions and procedures are well documented in both the Code of Conduct and the HS&E policy.

The Environmental Statement outlines our commitment to minimizing waste in the use of paper, promoting the purchase of recycled and recyclable paper products and the recycling of paper wherever possible.

The Statement further requires that the generation of excessive volumes of paper must be avoided. We have included a standard message on all email communication discouraging the printing of communication, thereby reinforcing the message with our employees as well as with our clients and suppliers.

All lighting and equipment is switched off when not in use.

Erinys in addition adheres and is committed to usually very demanding client HSE requirements - particularly on project sites.

Measurement of outcomes

Description of how the company monitors and evaluates environmental performance.

It is the duty of management to investigate breaches against the Company's HSE policies, and if necessary refer these to the relevant external agencies.

The Erinys Management Board is updated monthly on HSE related incidents, as well as their management and resolution.

There have been no reported HSE incidents in this reporting period.

ANTI-CORRUPTION

Assessment, policy and goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

Erinys abides by the US Foreign and Corrupt Practices Act⁹ and the UK Bribery Act 2010¹⁰ and holds their provisions to be binding on all subsidiaries regardless of location.

Erinys' stance on business is very clearly laid out in the Company's Code of Conduct.

The Company exercises a zero tolerance approach to corruption at any level.

Implementation

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

Erinys' anti-corruption policies are regularly briefed as part of our employee induction process, and periodic Code of Conduct training sessions as set out in Company's policy.

It remains line management's duty to investigate and report all incidents of alleged corruption, reporting these up the management chain as required.

Measurement of outcomes

Description of how the company monitors and evaluates anti-corruption performance.

Erinys has stringent internal management and accounting controls, in line with the Generally Accepted Accounting Practice (UK), to ensure that the Company meets relevant UK and international legal, financial and reporting obligations. This would identify any spurious payments which could be related to bribery or corrupt behaviour.

Erinys has a well established procedure for investigating corruption allegations, which provides for external audit agencies to become involved as required.

There have been no reported corruption incidents during this reporting period.