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October 14, 2012

**Subject: Communication on Progress (COP) for United Nations Global Compact.**

(Period covered by this Communication on Progress: **2011 to 2012**)

To Our Respected Stakeholders,

Since 2009, TeleConsult Group (TCG) has been an active member of the United Nations Global Compact (UNGC), and has continued to embody the Compact's core principles in its day to day practices and activities. By upholding these values, TCG is not just ensuring its activities have a positive impact on society and the environment, but seeks to promote these principles within its sphere of influence. This Communication on Progress (COP) describes TCG's efforts to implement the UN Global Compact's principles in various areas, and is being shared with all our stakeholders.

For TCG, responsible and positive corporate citizenship is not just an afterthought, but has always been integral guiding value underlying all of the company's goals and activities. TCG recognizes the social and environmental impact its activities have, and views corporate social responsibility not as an obligation, but as an opportunity to foster good community relations and create a sustainable business model. TCG also recognizes the business case for integrating responsible practices in its operations, as effectively doing so elevates credibility, motivates workers, and ensures longevity. Additionally, through continued engagement with the UNGC, TCG hopes to promote these values further within the broader business community.

Over the past year, TeleConsult Group has stepped up its CSR initiative. The designation of a sustainability leader was a major step in ensuring that these goals and guidelines are not just being passively followed, but that a concerted effort to maximize impact at all levels is effectively made. While there have been many notable initiatives undertaken over the past few months (such as the launching of the Support Line project and hiring of special needs people), the most significant outcome has been the (ongoing) development of a consolidated sustainability framework and overall CSR policy for the company, bringing together the various existing but disparate policies and articulating informal practices. It is worth noting that the UNGC's COPs have also been a very useful tool in the continued development of this framework. But beyond developing and implementing policy, the major achievement over the past year has been the increased level of awareness, interest and engagement amongst the entire TCG team with regard to sustainable practices.

I am pleased to reaffirm TeleConsult Group's support for the United Nations Global Compact's ten principles with respect to human rights, labour, anti-corruption and environmental issues, as well as the broader goals of the United Nations. TCG remains committed to making the Global Compact and its principles a part of the strategy and goals, culture, and day to day operations of the company. We look forward to continue moving ahead while promoting the Compact's mandate, and maintain a positive outlook for the global establishment of a higher standard of responsible corporate citizenship and engagement.

  
**Naila Chowdhury**  
Chairman & CEO  
TeleConsult Group

## Human Rights:

### **Assessment, policy and goals:**

Upholding human rights is a fundamental concern not just for businesses, but for society at large. TeleConsult Group has always taken a firm stand on the respect for human rights, which it holds as an uncompromisable requirement for all its own as well as its partner's activities. TCG further recognizes the business case for protecting human rights both internally and effecting positive influence in this regard when it comes to partners and suppliers, as the resulting improved law and order situation, better community relations, and overall impact on business climate will benefit all stakeholders.

TCG adheres strictly to the Universal Declaration of Human Rights and all relevant human rights legislation in Bangladesh. The company fosters an environment that upholds the dignity of all, is free from any form of discrimination, and in no way infringes upon these internationally recognized provisions. The company's approach goes beyond preventing abuse of human rights, taking special measures to include marginalized sections of society, with the goal of setting a positive example within the community, and to reinforce this mission internally. Over the past year, TCG has run a program of training and recruiting special needs persons, in an effort to demonstrate the potential of those undervalued sections of society. The company's most notable CSR initiative in the area of human rights (and others) over the last year has been the development and launching of a pro bono phone based crisis support line, geared at providing counseling and other support services to women and girls in Bangladesh. To further extend this support for human rights, any potential partner or supplier is screened for human rights abuse records before TCG enters into business with them.

In addition to its preexisting support for human rights, TCG is moving forward with its commitment to this cause and the support for the United Nations Global Compact's 10 principles by gradually disseminating and implementing the various tools provided by the UNGC. Integrating valuable resources such as the Business and Human Rights Learning Tool and Guide on How to Develop a Human Rights Policy will be a significant part of TeleConsult Group's forward strategy of developing a consolidated corporate social responsibility framework. In particular, the implementation of the UNGC's Women Empowerment Principles (WEP) has been a concrete goal for TCG this past year, both through training programs for victims of gender based violence, as well as the provision of employment opportunities for special needs persons. The promotion of gender equality is a major concern for TCG, the company's slogan being "where women come first".

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## Implementation:

TeleConsult Group directly addresses the United Nations Global Compact's principles in regard to human rights as follows:

- *Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights*

Respect for human rights has always been a fundamental part of TCG's corporate culture. In addition, the code of conduct that all employees are required to sign ensures that these rights are never infringed upon. Further, TCG's gradual integration of UNGC tools (such as the Guide on How to Develop a Human Rights Policy) will continue to formalize and strengthen the company's stance in regard to this principle.

- *Principle 2: make sure that they are not complicit in human rights abuses*

Background checks done for all potential partners and suppliers screen out any party that has faced allegations of human rights infringement, ensuring TCG is never complicit in human rights abuses.

In addition, the following measures have also been taken over the past year to advance TeleConsult Group's commitment to upholding human rights, and promote this cause in the workplace:

- The implementation of the United Nations Global Compact's principles in regard to human rights has been formally made an agenda priority for top level management
- TCG developed and launched the "Support Line" project, in collaboration with NGOs and other private sector partners. This phone based crisis hotline has been developed to address the issue of human rights (and other) abuses faced by women and girls across Bangladesh, with special provision for female garment workers. This helpline is operating on the premise that 'awareness is empowerment', with a primary goal of serving as a tool to educate girls and women on human rights and legal entitlements. The Support Line project also provides basic counseling, as well as referral to resources for further assistance (including NGOs and government agencies), and will also be used to facilitate statistical research. By undertaking this project, TCG is using its resources and expertise (in the area of call center operation) to extend its impact on the human resource practices nationwide.
- In March 2012, TCG recruited and trained a batch of special needs persons from the Acid Survivors' Foundation to serve as call center agents. These women are victims and survivors of gender based violence, and have received special training focused on personal development to help their transition into a professional environment. They also received technical training, greatly raising their employment viability, and enabling them for the first time not only to be economically independent but to also be able to support their families. Additional facilities have also been provided for them, including monthly group counseling. This is part of TCG's ongoing effort to integrate persons marginalized by human rights abuse.

- TCG is setting up for the next batch of the “Empowering Women Through emerging technology - ICT Skill Development” program (to be held in a few months’ time), aimed at increasing opportunities for victims of gender discrimination.
- A formal section on human rights issues is being developed for inclusion with TCG’s code of conduct (and new CSR policy framework), taking guidance from UNGC tools such as the ‘Guide on How to Develop a Human Rights Policy’.
- All partners and suppliers have been screened to check for any allegations of human rights abuse.

#### **Measurement of outcomes:**

- No human rights related charges or issues have been raised against TCG.
- No human rights related charges or issues have been raised against any of TCG’s partners or suppliers.
- In March 2012, TCG Chairman and CEO Ms. Naila Chowdhury, appeared and spoke at a Women Empowerment Principles conference arranged by the UNGC (‘Moving the Gender Equality Dial’) to speak about the company’s activities in this area, and to share views and experience.
- The Support Line project was successfully launched on the 23<sup>rd</sup> of September, and has begun receiving calls addressing human rights (and other) issues faced by girls and women across Bangladesh.
- A batch of special needs persons (victims and survivors of gender based violence) from the Acid Survivors’ Foundation have been recruited, and are now working full time with TCG.
- Participants of TCG’s training programs for special needs persons have found employment (with TCG and other organizations).
- TCG maintains diversity in its workforce.

## Labour:

### Assessment, policy and goals:

TeleConsult Group has always deeply valued its employees, and continues not only upholding internationally recognized labour standards, but strives to foster a positive and supportive work environment. It is the company's belief that ensuring labour rights and addressing workers' concerns is not just an obligation, but that providing a workplace that is tolerant, dignified, and encouraging brings out the best in everyone. The company's employees are its most valuable assets, and ensuring their welfare is fundamental to the organization's success.

TeleConsult Group's labour practices, as implemented through employment terms, human resources policies and other practices, ensure compliance with all relevant standards laid out by the International Labour Organization (including the ILO's Declaration on Fundamental Principles and Rights at Work), as well as with Bangladeshi labour law. These policies and practices go beyond safeguarding labour rights, but seek to produce a motivated, engaged and fulfilled team. The company therefore considers open and clear communication with all workers a priority, to understand their position and issues, and constantly work towards improvement. Over the past year, TCG has extended its existing human resource policies, undertaken special training programs for senior staff, and continued emphasizing the value of a positive work environment and worker relations, both to further its commitment to its staff, and to continue setting an example of responsible corporate citizenship. In addition, TCG remains vigilant to ensure that all its partners and suppliers themselves uphold labour standards, seeking to spread these values within its sphere of influence.

### Implementation:

TeleConsult Group directly addresses the United Nations Global Compact's principles in regard to labour issues as follows:

- *Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining*

TeleConsult Group not only stands for the freedom of association, but encourages its staff to openly discuss their issues of concern and bring these to the attention of management. Staff meetings are not only organized by management, but are often held autonomously by workers on the company's premises and with the company's full consent and support.

- *Principle 4: the elimination of all forms of forced and compulsory labour*

TCG has zero tolerance for any form of forced labour, restriction in workers' mobility, or any other practices that inhibit them from choosing their own course of action. Where applicable, standard working hours are clearly

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stated in employment contracts, but staff members are free to terminate these agreements at their own choosing. All TCG employees receive fair remuneration, including overtime as applicable.

- *Principle 5: the effective abolition of child labour*

No one below minimum legal working age is considered for employment, and verifiable documentation regarding date of birth is a requirement for any applicant. In addition, TCG's zero tolerance policy for child labour extends to all partners and suppliers, ensuring that no parties the company deals with engage in child labour.

- *Principle 6: the elimination of discrimination in respect of employment and occupation*

TCG is an equal opportunity employer, and no form of discrimination is tolerated. This is reflected in the diversity within the company's workforce, with men and women of various racial and religious backgrounds holding positions at every level within the organization.

In addition, the following general measures have also been taken over the past year to advance TeleConsult Group's commitment to setting a higher standard in labour practices and worker relations:

- The implementation of the United Nations Global Compact's principles in regard to labour issues has been formally made an agenda priority for top level management. This will include the development of measureable indicators to gauge progress in the area of labour issues and worker relations.
- Several sessions on Bangladeshi labour law were arranged for management, and were also open to other employees.
- A multi-faith calendar has been used as a basis for setting company holidays
- An 'open-door' policy has been implemented to encourage greater interaction between senior executives and all employees.
- Regular staff meetings have been held, and arrangements made for the placement of confidential complaints.
- All partners and suppliers have been screened to check for any allegations of labour related misconduct.

#### **Measurement of outcomes:**

- No labour practices related charges or issues have been raised against TCG.
- No labour practices related charges or issues have been raised against any of TCG's partners or suppliers.
- An exceptionally supportive work environment has been effectively established. This achievement is highlighted by the successful integration of a batch of special needs persons TCG has recruited in March 2012. These employees, taken from the Acid Survivors' Foundation (ASF) are victims and survivors of gender based violence (more specifically, survivors of acid attacks), and through special training,

supportive policies, and a continued commitment to greater workplace sensitivity, they are now a fully integrated part of the TCG team.

- All TCG staff members are employed under a consistent and clear contract structure that upholds international labour standards and ensures equal and fair treatment for all.
- Workers have responded positively to open door management policies, resulting in more frequent exchange of views.
- Feedback from staff meetings is regularly and successfully addressed.

## Environment:

### Assessment, policy and goals:

TeleConsult Group is very conscious of the ecological impact its operations have. Although not involved in any activities with heavy environmental costs, TCG still constantly strives to minimize its environmental footprint. The major approaches the company takes in this regard include reducing the amount of waste it produces (particularly paper waste), promoting recycling, and encouraging efficient energy use.

### Implementation:

TeleConsult Group directly addresses the United Nations Global Compact's principles in regard to the environment as follows:

- *Principle 7: Businesses should support a precautionary approach to environmental challenge, &*

- *Principle 8: undertake initiatives to promote greater environmental responsibility*  
TCG takes a proactive approach in regard to environmental challenges, considering even issues that do not have direct consequence to the company's activities agenda priorities. No matter how significant, the company is codifying policy to address issues such as carbon emission and deforestation by promoting efficient energy use and reducing paper-based activities.

- *Principle 9: encourage the development and diffusion of environmentally friendly technologies*

Adoption of new technologies, including energy efficient appliances, or software to replace paper-based activities, is a central part of TCG's efforts to address environmental issues.

The following specific measures have been taken in support of UNGC's principles regarding the environment:

- The implementation of the United Nations Global Compact's principles in regard to the environment has been formally made an agenda priority for top level management
- Installation of software intended to replace printing and hard-copy record keeping, in order to minimize paper usage and move TCG towards becoming a paperless office.
- Distribution of recycling bins.
- Installation of energy saving bulbs throughout all workspaces. Mandate to procure only energy efficient appliances.
- Office vehicles have been converted to run on cleaner natural gas (instead of



petrol).

- The reservation of a 'green space' for office renovation plans.
- The Rio Declaration on Environment and Development has been included as a fundamental guidance tool for the development of a companywide environmental policy. This will include the development of measureable indicators to gauge progress in the area of eco-friendly adaptation.

**Measurement of outcomes:**

- No environment related charges or issues have been raised against TCG.
- No environment related charges or issues have been raised against any of TCG's partners or suppliers.
- Several previously paper based administrative processes are now handled electronically, reducing the use of paper.
- Significant reductions in fuel usage for comparable company transportation requirements

## Anti-Corruption:

### Assessment, policy and goals:

TeleConsult Group sets a very high standard for ethical practice amongst its entire team, which is reinforced by regular audits. Morality is at the core of the company's culture, and care is taken to make sure all new members of the TCG team share similar values. In addition, TCG remains extremely vigilant against working with parties that may be involved with corrupt or fraudulent practices. TCG supports the UN Convention Against Corruption. In addition, TCG closely follows the activities of the Anti-Corruption Commission of Bangladesh.

### Implementation:

- The implementation of the United Nations Global Compact's principles in regard to anti-corruption has been formally made an agenda priority for top level management.
- Regular audits are undertaken to ensure that all the company's financial dealings are ethically sound.
- Any applicant with any incriminating history is not considered for employment.
- All potential clients, partners of suppliers are screened to identify any history or allegations of corrupt processes.
- Potential clients, suppliers or partners that have known political links or involvement are generally avoided.

### Measurement of outcomes:

- No corruption or unethical practice related charges or issues have been raised against TCG.
- No corruption or unethical practice related charges or issues have been raised against any of TCG's partners or suppliers.
- TCG submits financial audit reports to the to the concerned government bodies every year without issue.