

# Communication on Progress

5 March 2013



### TABLE OF CONTENTS

1.		STA	ATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER (CEO)	2
2.		HUI	MAN RIGHTS PRINCIPLES	3
	2.1.		ASSESSMENT, POLICY & GOALS	3
	2.2.		IMPLEMENTATION	5
	2.3.		MEASUREMENT OF OUTCOMES	6
3.		LAE	BOUR PRINCIPLES	7
	3.1.		ASSESSMENT, POLICY & GOALS	7
	3.2.		IMPLEMENTATION	8
	3.3.		MEASUREMENT OF OUTCOMES	8
4.		EN	VIRONMENTAL PRINCIPLES	9
	4.1.		ASSESSMENT, POLICY & GOALS	9
	4.2.		IMPLEMENTATION	0
	4.3.		MEASUREMENT OF OUTCOMES 1	1
5.		AN	TI-CORRUPTION PRINCIPLES1	2
	5.1.		ASSESSMENT, POLICY & GOALS	2
	5.2.		IMPLEMENTATION	2
	5.3.		MEASUREMENT OF OUTCOMES	3



### 1. STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER (CEO)

To our stakeholders,

I am very pleased to reaffirm Automotive Management Services' continued commitment to support the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption.

As a world leader in Fleet Management Solutions, AMS supports and respects the protection of human rights within the company's sphere of influence. We endeavor to conduct our business operations accordingly. This includes standing against such tragedies as human trafficking and the exploitation of children.

We recognize that we operate in diverse regions of the world and face many unique and complex environmental challenges. AMS is committed to environmental leadership and embraces environmental sustainability as a management imperative across all of its operations worldwide.

A reputation for integrity is crucial to the attainment of our commercial goals and to the fulfillment of our corporate responsibilities. It preservers our license to operate and is an essential asset which we are dedicated to protect and strengthen. We therefore expect every AMS employee to uphold high professional and ethical standards in all business conduct.

In this annual Communication on Progress, we will express our continuous support to the Ten Principles and the business initiatives which ensures the enactment thereof. These principles will play an even bigger role at AMS during the coming year as we continue to improve the integration of the United Nations Global Compact Principles into our corporate strategy, culture and daily operations.

Yours sincerely,

David J. Gronow Chief Executive Officer and President Automotive Management Services



### 2. HUMAN RIGHTS PRINCIPLES

Principle 1: Business 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

#### 2.1. CORPORATE POLICY, RISK ASSESSMENT & GOALS

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

#### 2.1.1. <u>CORPORATE POLICY:</u>

AMS acknowledges that as a leading fleet management solutions provider, with global operations, our business can help to promote human rights. Our approach towards human rights is aligned with the United Nations Guiding Principles for Human Rights. This synergy resulted in a partnership being formed between these entities to embrace, enact and support Human Rights.

AMS is in the process of developing a human rights model to guide how we manage our business globally. This model sets the standard for business practice and ethical conduct throughout our operations and is based on the following International Standards for human rights:

- Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- o International Covenant on Economic, Social and Cultural Rights (ICESCR)
- International Labour Organization Declarations & Conventions on Fundamental Principles and Rights at work

The building blocks of this model are outlined in the illustration below:



AMS introduced an employee handbook and various corporate policies which promote and protect the rights of our employees and individuals within our sphere of influence. These policies include, but is not limited to the following: Policy on Human Trafficking, Adequate Employee



Living Conditions and Withholding of Passports and other identification documents; Disciplinary Policy; Leave Policies; Health & Safety Policy; Drug-Free Workplace Statement; Travel Policy; Training Center Policy.

#### 2.1.2. RISK ASSESSMENT:

AMS will utilize Maplecroft's Human Rights Risk Atlas, and/or any other tool as such, to assess, quantify and compare human rights risks and responsibilities for our global operations. The table below outlines the countries of operation and their associated risk rating for 2012:

Country of Operation	Human Rights Risk Rating	
Afghanistan	Extreme	
Somalia	Extreme	
UAE	High	
Uganda	High	
Liberia	High	
USA	Medium	
UK	Low	

The aforementioned Human Rights Risk Index highlights that the majority of our operations and human capital are based in countries associated with a high to extreme human rights related risk. This magnifies the importance of a corporate commitment towards Human Rights and the potential impact that this commitment may have on the countries of operations.

#### 2.1.3. GOALS:

AMS aims to initiate the following additional initiatives to continue our progress on the enactment and promotion of Fundamental Human Rights.

- o Launch a Human Rights Awareness Program
- o Launch a Health & Disease Prevention Awareness Program
- Ensure Adequate First Aid Arrangements on all sites
- o Introduce a Formal Mechanism for Grievances and Controls for Disciplinary Formalities.
- o Audit the provision of Social Security Insurance across global operations
- Translate the employee handbook & Human Rights related policies to native languages where a language barrier might significantly limit the understanding and adherence thereto.
- Conduct a Human Rights impact assessment

The abovementioned initiatives excludes the goals in support of the Human Rights associated with the ILO Declaration on Fundamental Principles and Rights at work, as it will be outlined in Section 3 of this document.



### 2.2. IMPLEMENTATION

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

AMS accepts the responsibility to not only respect and promote Human Rights, but to promote it proactively. AMS has taken the following measures to prevent human rights violations in its work locations:

#### RIGHT TO LIFE & HEALTH:

- Initiation of an Ebola Disease Prevention Program within our operations located in high risk countries.
- Assess fitness to deploy and work in areas of potential danger, stress, and physical hardship when working in support of military operations.
- Inform employees of the health risks associated when deploying to post-conflict countries and secure written confirmation of voluntary deployment thereto.
- Provision of employee insurance benefits and security which is adequate to protect staff from health & safety risks associated with post conflict countries.
- Ensure a well-balanced diet is followed by staff deployed to remote areas where food supply is limited.
- Perform Random Drug Tests to ensure safe working conditions.
- Educate staff on practice and conduct required to ensure a safe work environment through health and safety training.

#### RIGHT TO JUST & FAVOURABLE WORKING CONDITIONS:

- Ensure company-provided recreational facilities are available for staff in major operational sites.
- Require staff to take R & R (Rest & Recreation) leave when deployed to post-conflict operations for longer than 6 months at a time.

#### RIGHT TO EDUCATION & DEVELOPMENT:

 Contribute towards local capacity building and personal development through Basic English & Maintenance Training.

#### FREEDOM OF THOUGHT, RELIGION & CULTURE:

- o Honoring reasonable religion related requirements.
- Employment Contractual Terms are available in native languages where a language barrier might significantly limit the understanding thereof.
- o Include Cultural Awareness Programs in the Induction Program.
- Host Photography Competition to promote artistic expression in countries where the government support for arts is minimal.

#### RIGHT TO WORK/LIFE BALANCE:

- Offer employment terms which allow an extended period of annual leave between deployment periods. This enables staff to spend more time with family members.
- Investment in the enhancement of our information technology infrastructure in remote locations to encourage frequent communication between staff and their family members.

The abovementioned initiatives excludes those taken in support of the Human Rights associated with the ILO Declaration on Fundamental Principles and Rights at work, as it will be outlined in Section 3 of this document.



The initiative to promote and respect Human Rights is the responsibility of each and every staff member. The management of programs and policies in support thereof is however the responsibility of the Human Resources Department and is endorsed by the Chief Executive Officer & President.

### 2.3. MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates performance.

2.3.1. The AMS Compliance Department conducts regular audits throughout the organization to ensure compliance with these policies and to confirm that business practice respects and promotes fundamental human rights. Violations detected through these audits were minimal and addressed appropriately. The Reporting year can be closed out with no outstanding corrective actions.



### 3. LABOUR PRINCIPLES

*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 labor;

Principle 5: The effective abolition of child labor; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

### 3.1. ASSESSMENT, POLICY & 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.

#### 3.1.1. CORPORATE POLICY:

AMS respects and supports the values of the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. This commitment is demonstrated by integrating its four fundamental principles into our corporate Human Rights Framework (Section 2.1.) and standard business practice on a global scale. These Four Fundamental Principles were adopted in 1998 by the ILO and are aligned with the UN Global Compact's principles on Labour.

AMS introduced an employee handbook and various corporate policies which is aimed at promoting, respecting and realizing the ILO's Four Fundamental Principles and Rights at work. These policies include, but is not limited to the following: Policy on Human Trafficking, Adequate Employee Living Conditions and Withholding of Passports and other identification documents; Disciplinary Policy; Leave Policies; Health & Safety Policy; Drug-Free Workplace Statement; Travel Policy; Training Center Policy.

#### 3.1.2. RISK ASSESSMENT:

The outcome of Maplecroft's 2012 Human Rights Risk Assessment was outlined in Section 2.1.2 of this document. The Human Rights related risks which were assessed in Maplecroft's study include the risks associated with the ILO's Declaration on Fundamental Principles and Rights at Work. The results emphasized that the majority of our operations and human capital are exposed to human rights related risk with ratings ranging from high to extreme. AMS subsequently operates in areas which does not automate the integration of human rights into everyday business practice. AMS purposefully encourages the adherence to human rights international standards through a commitment to abide to our own polices or local law, whichever sets higher standards.

#### 3.1.3. <u>GOALS:</u>

AMS aims to initiate the following additional initiatives to continue our progress on the enactment and promotion of the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work:

 Release a Recruitment & Selection Policy to ensure non-discriminatory hiring practices which also prohibits the use of child labour.



- Launch an Awareness Program which will include the creation of awareness about the Four Fundamental Principles stipulated in the ILO Declaration.
- Introduce a Formal Mechanism for Grievances to allow staff to appeal against practice which violates the Human Rights outlined in the ILO Fundamental Four Principles and Rights at Work.

#### 3.2. IMPLEMENTATION

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

In support of the ILO Declaration on Fundamental Principles and Rights at work, AMS has taken the following measures to prevent human rights violations in its work locations:

#### RIGHT TO STRIKES, TRADE UNIONS AND COLLECTIVE BARGAINING:

• Formalization of a Collective Bargaining Agreement in Liberia

#### FREEDOM FROM TRAFFICKING IN PERSONS:

- Upgrade of Company Facilities to enhance living standards of our staff in remote areas of operation.
- Execution of a company-wide "Combatting Trafficking in Person" Awareness Program whereby each staff member was required to sign a statement of commitment thereto.

#### PROTECTION OF CHILDREN:

• Introduced adequate mechanisms for age verification in recruitment procedures to ensure child labour is not used in our countries of operation.

#### <u>RIGHT TO EQUALITY, REMEDY AND FREEDOM FROM DISCRIMIATNION &</u> HARRASSMENT

o Continued use of just, favorable and non-discriminatory remuneration structures.

The initiative to promote and respect the Human Rights supported by the ILO Declaration is the responsibility of each and every staff member. The management of programs and policies in support thereof is however the responsibility of the Human Resources Department and is endorsed by the Chief Executive Officer & President.

#### 3.3. MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates performance.

The AMS Compliance Department conducts regular audits throughout the organization to ensure compliance with these policies and to confirm that business practice respects and promotes the human rights underpinned by the ILO Declaration. Violations detected through these audits were minimal and addressed appropriately. The Reporting year can be closed out with no outstanding corrective actions.



### 4. ENVIRONMENTAL PRINCIPLES

Principle 7: Businesses should support a precautionary approach to environmental challenges;Principle 8: Undertake initiatives to promote greater environmental responsibility; andPrinciple 9: Encourage the development and diffusion of environmentally friendly technologies

#### 4.1. ASSESSMENT, POLICY & GOALS

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

#### 4.1.1. <u>CORPORATE POLICY:</u>

AMS specializes in providing large dedicated automotive and fleet maintenance solutions to customers operating in austere environments, many of which are in conflict or post-conflict situations. The nature of many of these countries is such that they have been seriously impacted by years of insecurity and poverty, and generally they have poorly defined regulations and codes in relation to environmental protection.

In spite of the lack of environmental regulation and protection guidelines determined by the Host States, AMS is committed to meet International Standards on environmental and sustainability issues, and hence has become a signatory to the UN Global Compact. We recognize the significant importance of improving awareness of environmental and sustainability issues, and will make further concrete commitments and actions to meet clearly defined targets.

Current AMS policies and procedures in relation to the environment are focused on Quality Control and Health and Safety, where we ensure a safe working environment for our employees, sub-contractors, and customers, and deliver a very high level of service. By providing very clear quality control procedures, underpinned by the principles of ISO 9001 Certification, we significantly reduce risk in our operations, and therefore reduce environmental impact through preventative processes.

#### 4.1.2. RISK ASSESSMENT:

AMS will utilize Yale University & Columbia University's Environmental Sustainability Index (ESI), and/or any other such improved indexes, to create a comparative index of environmental sustainability and to provide a mechanism for making environmental management more quantitative, empirically grounded and systematic.

#### 4.1.3. <u>GOALS:</u>

We do recognize that realizing positive environmental impacts must not simply be a byproduct of existing procedures, but has to become a priority policy driving sustainable changes in the organization, and the environments within which we operate. It is with this goal in mind that AMS have committed to the following initiatives:

 Introducing a new comprehensive Health, Safety and Environment Management Plan, that will address many of the principles of the UN Global Compact, and guide policy change and practice within AMS.



- Review and update the Employee Handbook to reflect an enhanced HSE Management System including these measures to improve Environmental Policy and Protection measures.
- Part of the HSE Management Plan and in accordance with the OGP Guidelines for Waste Management with Special Focus on areas with limited infrastructure, Report No. 413, rev. 1.1 September 2008 (updated March 2009), AMS will introduce policies to specifically address the following core principles to better manage waste:
  - Waste Management Planning
  - Waste Minimization
  - Waste Register and Classification
  - Waste Segregation and Storage
  - Waste Awareness and Training

#### 4.2. IMPLEMENTATION

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

#### 4.2.1. HAZMAT AND ENVIRONMENTAL CONTROL PLAN:

Whilst AMS will try as much as possible to limit the use of hazardous materials in our operations, and to choose non-hazardous and non-polluting alternatives wherever possible, we also acknowledge that it is not possible to completely avoid using hazardous materials when performing automotive repairs and services.

AMS have a comprehensive HAZMAT Policy and Procedure in place to cover all aspects of hazardous goods handling in our operations. Training our employees to identify and handle HAZMAT as part of their job is a mandatory part of the induction process, and there are ongoing annual refresher trainings as part of the HSE training program.

This is why AMS has a very clear HAZMAT Policy and Procedure that makes the use of, storage and disposal of hazardous substances among our highest priorities. The use of Material Safety Data Sheets (MSDS) are mandatory, and all hazardous substances are properly labeled with color coded MSDS labels, and segregated from other products in isolated protected lockable areas. All HAZMAT is stored in approved drums and containers, free from rust and bulging, and protected from severe heat and/or cold. HAZMAT storage areas are well ventilated and have concrete floors to reduce the risk of spills and potential seepage into the ground.

Whilst these preventative procedures are in place, occasional spills are possible, and AMS have an effective spill response process in place should that occur. Contaminated hazardous waste resulting from spills will be contained and disposed of in accordance with local regulations.

#### 4.2.2. EMPLOYEE HEALTH & SAFETY:

AMS has made commitments in relation to the provision of the best possible living conditions for our employees under the circumstances that they work in, in the Policy on Identification Documents, Adequate Employee Living Conditions and Human Trafficking. This policy covers the provision of a living environment including good sanitation to ensure the hygiene and health of our employees is protected, adherence to Health and Safety regulations in relation to accommodation, canteen and life support areas, and effective waste management in line with local regulations and World Bank Standards. Whilst AMS exceed the minimum criteria for the provision of these basic environmental conditions we will address and improve in many areas with the implementation of the new HSE Management System.



The initiative to protect our environment is the responsibility of each and every staff member. The management of programs and policies in support thereof is however the responsibility of the Business Process Department and is endorsed by the Chief Executive Officer & President.

#### 4.3. MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates environmental performance.

AMS uses a rigorous Quality Control Plan and Compliance Assurance Program to monitor and maintain standards and performance in environmental safety and protection.

#### 4.3.1. THE QUALITY CONTROL PLAN:

The Quality Control Plan is built around the inclusive participation of our workforce, and uses the principles of ISO 9001, to implement processes and procedures to measure and hold people to account through a process of continuous improvement and prevention. In order to manage this effectively AMS has developed an application called Tools and Assets Management System (TAMS), that helps to track and report areas of non-conformity, corrective action steps, and responsibility. TAMS has modules covering facilities, health and safety, first aid, and asset management, and includes incident reporting functionality. The AMS incident reporting procedure has recently been improved and expanded to cover all incidents across the organization from minor vehicle accidents to serious environmental or security situations. The new procedure includes a rigorous decision making escalation process, and investigation follow up to ensure corrective measures are identified and implemented.

#### 4.3.2. COMPLIANCE ASSURANCE PROGRAM:

The Compliance Assurance Program supports the Quality Control Plan, and is controlled by a team of internal Compliance Managers. This structured program ensures that AMS maintains effective compliance to our contractual obligations, including health and safety and environmental commitments, as well as compliance to local and international standards. Compliance audits are carried out according to a structured calendar across all of the operations, where non-conformities and are highlighted and reported to the Program Managers and Director of Operations for their corrective actions. The AMS CEO has full visibility of all audit findings, and will hold the operation to account to meet corrective actions on time.



### 5. ANTI-CORRUPTION PRINCIPLES

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

#### 5.1. ASSESSMENT, POLICY & GOALS

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

#### 5.1.1. CORPORATE POLICY:

AMS has expressly established and implemented a Code of Ethics and Business Conduct together with an Anti-Corruption and Bribery Policy. These two policies form an integral part of who AMS and our Employees are and in all that we do. Our Code of Ethics and Anti-Corruption and Bribery Policy are distributed amongst all our stakeholders, including shareholders, personnel and third-parties via our internal Document Management System ("DMS") and recently introduced training programs in this regard.

#### 5.1.2. RISK ASSESSMENT:

AMS will utilize International Transparency's Corruption Perceptions Index, and/or any other tool as such, to assess, quantify and compare corruption risks and anti-corruption responsibilities for our global operations. The Corruption Perceptions Index ranks countries and territories based on how corrupt their public sector is perceived to be. A country or territory's score indicates the perceived level of public sector corruption on a scale of 0 - 100, where 0 means that a country is perceived as highly corrupt and 100 means it is perceived as clean from corruption. The table below outlines the countries of operation and their associated global rank and index score:

Country of Operation	Global Rank Rating	Corruption Score
Afghanistan	174	8
Somalia	174	8
Uganda	130	29
Liberia	75	41
UAE	27	68
USA	19	73
UK	17	74

The aforementioned Corruption Perception Index highlights that the majority of our operations and human capital are based in countries associated with a high to extreme corruption related risks. This demonstrates the importance of a corporate commitment to advocate anti-corruption behavior in an environment which does not encourage it.



### 5.1.3. GOALS:

AMS aims to continue with the execution of the following initiatives to ensure our progress on the enactment of Anti-Corruption Principles:

- Amend our contracts with Business Partners and Suppliers by requesting that they adhere to the Ten Principles of the UN Global Compact which includes the abolition of Anti-Corruption.
- Annual Review of Code of Ethics and Business Conduct and the Anti-Corruption and Bribery Policy by the Compliance Department. The purpose of this review is to broaden the sphere of influence of our anti-corruption measures to protect the reputations and interests of our shareholders. The Review will be guided by the UN Convention Against Corruption, national regulation and (where relevant) the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, Transparency International's Business Principles and the World Economic Forum's Partnership Against Corruption Initiative.
- o Launch Anti-Corruption & Compliance Awareness Program

#### 5.2. IMPLEMENTATION

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

The Code of Ethics and Business Conduct introduced and implemented by AMS in October 2010 has been implemented initially by making it available to all personnel on our DMS system and followed up by a Poster campaign which was launched throughout our global operations. Further to this all employees, upon joining the Company, undergo an induction course and are provided with an employee handbook, which both clearly and openly address our Code of Ethics and Business Conduct as well as the Anti-Corruption and Bribery Policy.

AMS has now developed a formal training program on the 10 Principles of the UN Global Compact, which will be rolled out to all employees (existing and new) during the course of the next reporting year. Literature / pamphlets will be provided to all stakeholders, business partners and 3<sup>rd</sup> Parties acknowledging our commitment to the 10 Principles, including this one.

The initiative to promote activities against corruption within corporate guidelines is the responsibility of each and every staff member. The management of programs and policies in support thereof is however the responsibility of the Head Office Compliance Department and is endorsed by the Chief Executive Officer & President.

#### 5.3. MEASUREMENT OF OUTCOMES

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

All payment approvals for any and all payments to government organizations, suppliers and or business partners are centralized through our Finance Department in Dubai and as such provide a strong control mechanism to ensure that Corruption does not occur throughout our operations across the world.

AMS has not received any reports or request claiming money or any other form of compensation from any source for the period covered by this COP.