# Control Risks



# The Global Compact Communication on Progress

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# CEO's statement of continued support for the Global Compact

Control Risks formally signed up to the UN Global Compact in September 2007, and is fully committed to embracing, supporting and implementing the ten principles. This is our first Communication on Progress. It places particular emphasis on human rights and anti-corruption. These issues are particularly sensitive in the complex environments in which we operate, many of which are affected by conflict. They are also the areas where we can make a distinctive contribution to the wider business and international communities.

# **About Control Risks**

Control Risks is an independent risk consultancy that helps its clients manage political, security and integrity risks worldwide. With offices in more than 20 countries, we work across the world and operate as one firm, in accordance with shared standards and principles. We employ 1,500 people from highly diverse backgrounds, and we work with clients from the public, private and non-profit sectors. We have worked for more than 5,300 clients in almost all industry sectors in over 130 countries.

Since Control Risks was formed, in 1975, it has been defined by a commitment to the highest standards of business integrity and ethics. Our four core values underpin all that we do. These are: integrity and ethics, professionalism and excellence, collaboration and teamwork, and commitment to people.

Our mission is to enable our clients to succeed in complex or hostile business environments. Because of the nature of our business, we advise clients in potentially controversial, sometimes dangerous and often morally complex situations. In these circumstances, the task of applying our values is a major commitment, a constant challenge and an essential operating requirement.

We aim to establish long-term relationships with our clients, based on trust, candour and mutual respect. When we decide whether to work with a new client, or to accept a new assignment, we take account of ethical issues, as well as legal compliance. At all times we work to retain the trust and respect of our clients and business partners, as well as the government officials and communities among whom we operate. There are occasions when we cannot support a client for ethical reasons.

# Control Risks and the Global Compact

There is already an overlap between Control Risks' core values, and the principles of the Global Compact. Our commitment to the Compact will now provide a natural extension and broad umbrella for our own values, influencing our strategy and how we take the business forward.

Commitment to these core values is essential in aligning our offices and business units, and is at the heart of what we consider to be the unique spirit of the company. All Control Risks' people are encouraged to live by our values wherever they are based. On joining the company, people are asked to embrace our values, and our induction programmes at all levels reinforce what the values mean to us in practice.

Over the last five years, Control Risks has expanded significantly, both in geographical reach and in the number of people we employ. Like many growing companies, we recognise the need for systematic training and formal management structures to reinforce our values and business principles. Control Risks has over the last year substantially revised and updated all its policies, with particular emphasis on its Code of Ethics, Business Integrity and Human Rights policies. Control Risks now has a comprehensive set of policies that underpins all aspects of our work and our internal processes. The Compact itself, and the guidelines it produces will provide an invaluable benchmark in weaving these still further into the fabric of our business, ensuring that our people have clear guidelines and effective operating procedures.

As far as progress on the specific principles is concerned, Control Risks has since joining the Compact made substantial progress in consolidating our activities around the Human Rights Principles. We are committed to providing the best possible working environment for our people, and we are taking further steps to ensure that there are equal opportunities for everyone and greater diversity across all our offices. Control Risks is still in the early stages on the Principles relating to the Environment, and the Compact is both acting as a catalyst and helping us shape our approach to the issue. Meanwhile, we are proud that we have made a significant contribution to the Anti-Corruption Principle. First, we have been active in the anti-corruption policy debate, through conferences, publications and participation in industry initiatives. Secondly, we have accumulated significant experience in helping clients implement anti-corruption measures both at head office level and on the front line in countries beset by endemic corruption. It is this combination of strategic and tactical experience that is most distinctive about our contribution in this area.

I am pleased to confirm our support for – and commitment to - the Compact.



Richard Fenning CEO, Control Risks

# **Human Rights**

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

rights; and

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

#### Commitment

Control Risks' commitment to the UN Global Compact's principles on human rights is expressed in our *Code of Ethics* which states:

'Human Rights. Control Risks supports the Universal Declaration of Human Rights, and our employees are never to be complicit in human rights abuses. We examine all advice to clients for its potential direct and indirect impacts on human rights. Control Risks abides by the Voluntary Principles on Security and Human Rights (VPs)'.

We elaborate on this commitment in a further policy document dealing explicitly with human rights (revised in July 2009), as well as policies on third party complaints (also revised in July 2009) and the company's Ethics Committee. All these documents are available on our company intranet.

Control Risks is unable to participate formally in the VPs process because of our status as consultants. However, we regard the VPs as a standard guidance document, not only in our work for VPs signatories but also when working with other entities facing similar challenges. Our human rights policy makes specific reference to the Universal Declaration of Human Rights, the VPs, the UN Global Compact, the Montreux Document (see below) and Professor John Ruggie's UN report on *Protect, Respect and Remedy: a Framework for Business and Human Rights* (May 2008).

## **Systems**

#### Training materials and reference documents

In May 2007, Control Risks prepared a 17-page *Introduction to Security and Human Rights* as well as a further set of Consultant Briefing Guidelines on the VPs. These are intended as reference documents to support consultants in their work. We plan to review and update both texts in the coming year (see below – Plans for 2009-2010).

#### Hostile Environment Close Protection Operators Course (HEPCO)

This is a six-day course that all our people in operational roles are required to complete before they are deployed to hostile environments such as Iraq. Participants are briefed on the UDHR, the Voluntary Principles, the Montreux Document and the UN Global Compact principles.

#### The Ethics Committee

Control Risks' Ethics Committee supports the company's commitment to applying and maintaining the highest ethical standards in the conduct of its business, as reflected in its Code of Ethics and Business Integrity Policy. The Committee comprises the CEO, two other members of the Main Board, and the Advisor, Governmental Affairs. Control Risks' people are encouraged to raise ethical concerns with the Committee, which is required to meet at least twice a year. In practice the Committee meets more frequently than this: 11 times in 2007 and 23 times in 2008. The Committee noted in its 2008 report that it had been "much encouraged by the growing evidence of ethical awareness throughout the company." Human rights concerns were an important factor in many of the issues it discussed.

#### Internal whistleblowing process

Control Risks' people are able to make an anonymous report if they suspect that a member of Control Risks is engaged in unacceptable or unethical conduct – on human rights or any other ethical issue - and if they feel unable to raise the issue with their line managers.

#### Third party complaints process

Control Risks recognises that the company, its management and its people are accountable for their actions and the consequences of those actions. It also recognises the importance of an effective process for investigating complaints raised by third parties. In line with this commitment we have revised our Third Party Complaints process in 2009.

Promotion of professional standards in the UK security industry

Control Risks is a founding member of the British Association of Private Security Companies (BAPSC - www.bapsc.org.uk) and we serve on its Membership and Standards Committee. We take a leading role in working to develop and implement appropriate professional standards across the industry, including on human rights issues.

We are contributing to the UK government's 2009 Consultation on Promoting High Standards of Conduct by Private Military and Security Companies (PMSCs) Internationally. We regularly contribute to associated work in wider academic, NGO and stakeholder forums.

Promotion of professional standards internationally

Control Risks supports the Montreux Document which was agreed in September 2008 and, as its title indicates, refers to 'Pertinent International Legal Obligations and Good Practices for States Related to Operations of PMSCs during Armed Conflict'.

We advocate the full adoption by states of the legal obligations and good practices outlined in the document. We are committed to meeting the explicit and implicit requirements of PMSCs as laid down in the Montreux Document.

We served as a core participant in a June 2009 conference on the development of an international code of conduct for PMSCs which was held at Wilton Park (UK) and sponsored by the Swiss government.

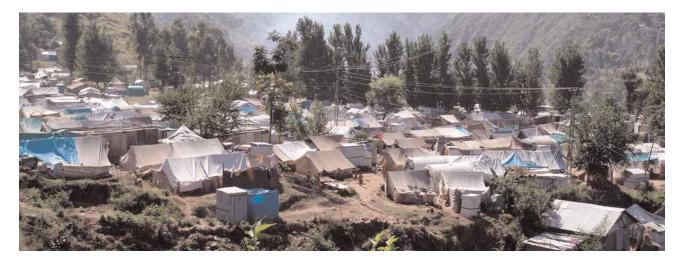
#### Business and peace building

The nature of our work in areas affected by conflict means that we have a particular interest in this topic. Indeed, Control Risks participated in some of the Compact's activities (for example, the development of the *Global Compact Business Guide for Conflict Impact Assessment and Resource Management* in 2002) before formally signing up to the Compact.

Our recent activities in this area include Control Risks consultant John Bray's participation in a UNDP project on *Post-Conflict Economic Recovery* (see http://www.undp.org/cpr/we\_do/eco\_recovery.shtml).

A revised version of his UNDP background paper was published as 'The Role of Private Sector Actors in Post-Conflict Recovery.' *Conflict, Security and Development* 9 (2009), No. 1, pp. 1-26.

In November 2008 John Bray made a presentation on the role of business and civil society in peacebuilding at Swisspeace's annual conference on *The Politics of Peace: from Ideology to Pragmatism* in Berne.



### Plans for 2009-2010

Implementation of human rights policy

In the year ahead, our priority is to consolidate the implementation of our human rights policy, reviewing:

- Our internal training programmes with a view to ensuring that these give sufficient emphasis to human rights;
- The risk assessment procedures we follow before taking on new projects in sensitive areas or areas affected by conflict;
- · Our briefing documents, such as the Introduction to Security and Human Rights mentioned above; and
- Our standard operating procedures for our people encountering any credible allegations of human rights infringements that are or could be seen to be associated with the activities of Control Risks or of a client.

# Labour

Principle 3: Business 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; and

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

### Commitment

• Commitment to People is one of Control Risks' four core values. The company is committed to providing a working environment in which all our people are able to realise their full potential in contributing to the success of our business, and this commitment is reflected in our human resources policies, and in the human resources systems and activities in place across our offices.

- Control Risks respects the right of employees to form and join trade unions for the protection of individual and collective interests.
- The company is committed to ensuring that its people are consulted of any changes to the business that has an impact on their employment.
- · Diversity has been identified as one of eight key elements in our HR strategy.

The following statements are extracts from our human resources policies:

- 'Control Risks is committed to providing a working environment in which respect for people's dignity is at the core of our organisation. Every employee has the right to dignity at work. The company and all its employees have accountability to ensure a working environment in which everyone is treated with respect and dignity'.
- 'Control Risks' employees have the right to work in an environment of mutual trust and respect, where everyone is fairly treated without discrimination'. The policy emphasises the fact that any employee who has taken action against discrimination 'will not be victimised in any way'.
- 'Control Risks aims to ensure that no employee, job applicant, client or supplier is discriminated against, either directly or indirectly on the grounds of sex, race, colour, nationality, ethnic or racial origins, sexual orientation, age, religious belief, marital status or disability'. This policy statement applies to all decisions relating to hiring, employment opportunity and promotion.

# Systems

Control Risks complies with local legislation in the countries where we operate. Where our own standards exceed those of local legislation, we will apply our own standards: the issue of forced or compulsory labour, or child labour, therefore does not arise in our own operations. The company vets its subcontractors (as well as all prospective employees) before engaging them, and together with its agents, representatives, joint venture partners and suppliers, expects them to abide by its policies when working on the company's behalf.

A grievance policy and process, involving three stages of escalation, is in place to ensure that any issues arising, for example discrimination, are dealt with fairly and objectively.

At Control Risks, we set high standards for our people and offer structured training and development programmes for our people at all levels designed to help people meet those standards and achieve their full potential. Training and development takes the form of e-learning, residential and non-residential courses and workshops run internally and externally, regional training weeks, and management and senior management programmes.

As with human rights more broadly, Control Risks' people are expected to raise any concerns about clients' labour practices with the company's Ethics Committee.

- Control Risks is currently reviewing its HR policies and drafting a new overall HR policy to ensure that we are meeting or exceeding best practice internationally.
- As part of the company's commitment to ensuring equal opportunities for all our people, diversity is currently being addressed in a new initiative launched in 2008. Focus groups were formed involving a range of people across our offices, and external research on diversity was commissioned. In addition, a review by an external consultant has identified the company's current position in terms of diversity, and has highlighted the areas that need to be addressed.
- First steps have included a focus on measures to support women in building long-term careers and progressing to senior roles, by improving information about maternity provision; and educating managers on maternity leave processes, including communication during maternity leave, handling applications for flexible working and the rights of women before, during and after maternity leave.

#### Plans for 2009-2010

- A new family section will be added to the company's intranet, including statutory entitlements, Control Risks' policies, links to useful associations, childcare voucher information etc.
- A series of workshops for managers will be run to highlight Control Risks' family policies and outline the resources available to its people.
- A mentoring programme will be piloted for high-potential individuals.
- New mechanisms for transparent career path planning across the organisation will be launched to support international mobility and diversity.



# **Environment**

Principle 7: Business should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

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

#### Commitment

Control Risks' commitment to the UN Global Compact's principles on the environment is expressed in our environment policy, which states:

Control Risks has a responsibility to make a positive contribution to the environment and communities in which the company operates and to strive to lessen the impact that it has on climate change.

Control Risks will comply with both global and region specific environmental legislation and approved codes of conduct, whilst at the same time aspiring to meet higher standards of best practice.

Control Risks believes that all employees have a part to play in protecting the environment and as such the company is committed to the on-going education, participation and training of its employees on environmental issues and the potential environmental impact its operations may have. Control Risks expects similar commitment from our suppliers and contractors.

#### Areas of Focus

Control Risks has identified three key areas of focus. The company is committed to the continuous monitoring, evaluation and review of its performance in these areas. The environmental priorities lie in the following areas:

#### Workplace

- · Waste reduction: recycling of office materials
- · More efficient use of energy and water

#### Travel

· CO2 emission reduction and pollution prevention

#### Sustainability

As a service-providing organisation with a network of offices across the globe, the sustainability of our workplace environment is a key priority. All our office space is leased through managing agents and as such a number of areas of potential environmental impact are not within our direct control. Where the company is able to it will seek to positively influence landlords' environmental approach and performance.

Sustainable travel, both to and from the workplace and business related, is our other key priority. The company is committed to looking into the schemes available to it and where possible providing alternative options for our employees, including initiatives such as incentivised use of public transport/cycling and the optimisation of the use of technology. Where travel is an essential part of our service to clients the company is committed to investigating ways in which it can off-set its carbon footprint.

#### Organisation – Roles and Responsibilities

#### All employees

- Co-operate and comply with any environmental instructions or initiatives outlined by the Executive Committee, Regional Executive Committee or local business unit managers.
- Report annually to the Executive Committee on regional environmental matters as part of the company's participation in the UN Global Compact.

#### Regional Directors

- Develop local environmental initiatives for all offices within their region in line with this policy and with local legislation.
- Report annually to the Executive Committee on regional environmental matters as part of the company's participation in the UN Global Compact.

#### **Executive Committee**

- · Appoint a member of the Committee to sponsor and champion environmental management within the company.
- Review the performance of the environment initiatives.

## **Systems**

We are at the initial stages of establishing our environmental approach but we are seeking to utilise the international standard ISO14001 as a framework across our businesses.

#### Environmental champions

Recognising the importance of communication with, and buy-in from, our people, we are identifying environmental champions who will be responsible for coordinating our approach across all the offices within each of the regions in which we operate.

#### Regional management

The environment will feature as an agenda item at meetings of our regional management teams, who will be responsible for overseeing and evaluating the implementation of our strategy.

#### **Executive Committee**

The Group Executive Committee will be responsible for the overall implementation and review of our environmental policy. We are liaising with a number of auditors, and activation and mentoring agencies in order to benchmark and thereafter develop systems which will enable us to meet our goals. Our London office will provide a template approach which our other regional offices will then adapt to their own operations. We will seek to gain validation/accreditation from a recognised body (for example the National Energy Foundation through Green500) for our London business, which again we will extend to our regional offices.

#### Audit

The Executive Committee or Internal Audit may commission audits to ensure that the environment management system is operating effectively.



Control Risks is committed to sharing best practice in all areas of environmental protection and, as such, the company will seek to extend successful conservation and reduction schemes across our operations.

#### Waste reduction

Our activities in this area include:

- · Participation in recycling and shredding schemes such as our involvement in the national UK programme 'Shred-it'.
- Commitment to the procurement of recycled paper and office materials wherever possible.
- Directives for the more extensive use of email; incorporation of a 'don't print' logo on email; and double-sided printing.
- Technology improvements: a significant new initiative is the migration of the business to a Sharepoint IT platform.

#### Energy/water efficiency

Control Risks provides office facilities managers with guidelines for energy and water saving – including advice on switching off lights/IT systems when not in use; managing heating/air conditioning levels more effectively; controlled flush toilets; and green water boilers.

#### Travel

Commuting to work. Control Risks is conducting employee surveys on methods of getting to and from work, and is looking into joint-funding supported initiatives such as Seltrans in London, which promotes greater use of public transport as well as cycling and walk-to-work schemes.

Business. Control Risks is seeking to encourage greater use of teleconferencing and looking to invest in wider video conferencing facilities. Through the process of auditing our carbon emissions we are seeking to clarify those attributed to business air travel. We will then review options for offsetting these emissions.

## Plans for 2009-2010

The Executive Committee will review the progress of the regional management teams on all environmental initiatives, and will set objectives for the year ahead accordingly.

# **Anti-corruption**

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

### Commitment

Control Risks' commitment to the tenth Principle is expressed in its Code of Ethics, which states:

'Business Integrity. Business integrity goes beyond compliance with the law, and involves the application of our core values. Control Risks does not pay bribes or receive kickbacks either *directly* or *indirectly*. Control Risks' people are expected to use their judgement not just to avoid malpractice but to promote good practice in accordance with the company's commitment to high standards of integrity'.

We elaborate on this statement in our *Business Integrity Policy*, which was rewritten in October 2007. This covers: bribes and kickbacks; facilitation payments; gifts hospitality and expenses; personal conflicts of interest; charitable donations; political activities; business relationships; and audits and accounts. The policy, which is available on the company's intranet, makes specific reference to the OECD Anti-bribery Convention and to the laws of the UK and other OECD member countries covering foreign bribes.

Many of our consultancy activities relate directly to the anti-corruption agenda. Our activities in this area are summarised on our website on www.control-risks.com/businessethics. Through our consultancy and through our public activities such as the publication of our White Paper series, we hope to make a wider contribution to raising anti-corruption standards in business.

# Systems

#### Internal training

Control Risks conducts a range of activities to ensure that all its people are familiar with the *Code of Ethics* and the *Business Integrity Policy*, and provides further training for people in positions of special responsibility or those who operate in high-risk areas:

- · Induction. Our first-day orientation and three-day induction programmes cover our values, and emphasise our ethics.
- E-learning. All Control Risks' people are required to work through a series of e-learning training units known as eCriteria. An introductory unit, designed in-house, includes integrity-related scenarios whereby employees are asked to use their judgement in selecting the correct course of action.
- Company policies. All Control Risks' people are required to confirm that they have read and understood the Code of Ethics, together with all our other policies, when they join the company. In late 2008, all existing employees were required to read our revised and updated set of company policies, including the Business Integrity policy and Code of Ethics, and confirm that they had done so.
- Management Training. Senior managers including heads of country offices and major departments are required to
  attend a four-day residential course, designed around living the values at Control Risks. A substantial part of the first
  morning focuses on business integrity issues, and the theme is explored further in a challenging, interactive exercise on
  the last day. More than 100 managers have completed the course since it was piloted in October 2007, and more are
  scheduled in the year ahead.

#### Regular risk reviews

Our Risk Manager and his team conduct regular risk reviews and internal audits of all key business units and international offices. As a matter of routine, these audits include a review of all aspects of compliance with our Business Integrity Policy.

#### Internal whistleblowing procedures

Control Risks' people are encouraged to make an anonymous report if they suspect that a Control Risks' employee is engaged in unacceptable or unethical conduct – including corruption - and if they feel unable to raise the issue with their line manager.

Anti-corruption training for consultants operating in Nigeria.

Some 70 Control Risks consultants are 'embedded' with international companies operating in Nigeria. In September 2008, we held two one-day anti-corruption workshops for these consultants, in Lagos and Port Harcourt. We repeated the exercise in May 2009. The workshops covered international legal developments, prevention, and response to problems.

#### Thought leadership

As an opinion leader in the anti-corruption field, Control Risks regularly publishes reports and assessments of the latest developments, as well as contributing to the publications of other organisations, and taking part in international conferences and seminars.

The following 'White Papers' are available free of charge on our website (www.control-risks.com/businessethics). Recently published reports include:

- Corruption, compliance and change (2009). This report analyses the tighter but still uneven pattern of international enforcement of anti-corruption laws, and then discusses national and regional trends taking China, Nigeria and Central and South-east Europe as examples. It concludes with a review of the anti-corruption compliance and engagement strategies that companies need to adopt if they are to achieve commercial success in an 'unfair world'.
- Facing up to corruption in Nigeria (2009). This report draws on the findings of more than 30 interviews with senior executives, lawyers, journalists and officials, and seeks to answer one simple question: is it possible to do business successfully in Nigeria without involving employees in corrupt practices?
- Business, corruption and economic crime in Central and South-east Europe (2009). This report is based on a survey of 241 businesspeople in Bulgaria, the Czech Republic, Hungary, Poland, Romania and Serbia. This report discusses the impact of corruption for business. How far do corruption and crime impede economic development? What are companies doing to resist corruption? And what should they be doing?

Participation in anti-corruption conferences, workshops and seminars

Again, as part of our thought leadership activities, Control Risks regularly sponsors and participates in local and international conferences on anti-corruption issues. A recent selection of such events includes:

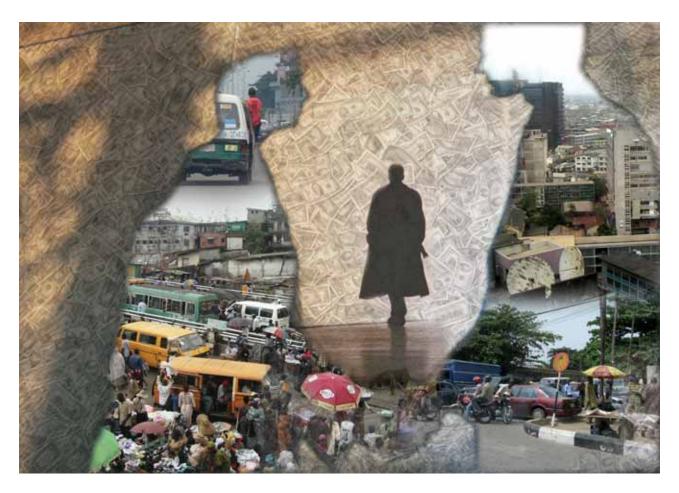
- 16-17 June 2009. Control Risks co-sponsored the 2nd China Summit on Anti-corruption in Shanghai, China.
- 2 June 2009. Control Risks and the international law firm Simmons & Simmons co-sponsored a seminar on Facing up to corruption in international business held at the Japan Bank for International Cooperation (JBIC), Tokyo, Japan.
- 5 May 2009. Control Risks ran an interactive workshop on *Facing up to corruption in Nigeria* for businesspeople based in Lagos.
- 26-28 November 2008. Control Risks made a presentation on 'Combating Corruption in Business Transactions'. Fighting Corruption in Asia-Pacific: Strategies for Business, Government and Civil Society. 6th Regional Anti-corruption Conference for Asia and the Pacific. Asian Development Bank/Organisation for Economic Cooperation & Development, Singapore.
- 4 November 2008. Control Risks ran an interactive workshop on 'Tackling Corruption' at the CSR-Asia Summit in Bangkok, Thailand.

Participation in Transparency International (TI) initiatives

Control Risks has been a member of the Transparency International (UK) Corporate Supporters' Forum for many years. In September 2009 we will be hosting a 'Practitioners' Workshop' under the auspices of the Forum at our London offices.

The TI Global Corruption Report, which is due for publication in September 2009, will contain an article by Control Risks consultants Kristóf Gosztonyi and John Bray on 'Public and private sector corruption in Central and South-eastern Europe'.

Control Risks gave a presentation on 'Combating Corruption in Democratic Transition. International Business Perspectives' at the Anti-corruption Forum organised by Transparency International in Bali, Indonesia on 22 January 2008.



# Plans for 2009-2010

#### Thought leadership

Control Risks will continue to contribute to external conferences and to prepare 'White Papers' to promote best business practice. Current plans include:

- Co-sponsorship of the Global Oil and Gas Anti-Corruption Forum, in London in September 2009.
- A 'White Paper' on Business Integrity in China, which will be publicly available.

#### Reinforcing policy implementation

We are currently reviewing our ethics training across the company, with a view to reinforcing the implementation of our anticorruption policies:

- A challenging new residential course for Senior Managers is being designed, which will include a strong ethical component. Lasting up to three days, the performance and judgement of delegates will be evaluated by members of Control Risks Board and Executive Committee.
- We are planning further anti-corruption training workshops for consultants in Nigeria and other high-risk areas.

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