

October 13, 2013

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

(Period covered by this Communication on Progress: **2012 to 2013**)

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.

This past year TCG has further enriched its policies and practices regarding sustainability and corporate responsibility, and has seen a significant deepening of its level of engagement with the Compact's core principles. The initiatives and measures that were gradually built up over previous years are now showing definitive results, which encourage us to continue moving forward. Previous projects have matured and extended their reach, such as the Support Line project, which is now fully operational, has developed into its final phase, and is experiencing growing call volumes. These gradual successes have inspired the development of new concepts for future sustainability projects, including the training and employment of additional special needs persons, on a scale much larger than before. In addition, TCG has sought to extend its involvement with its CSR endeavors beyond the company's immediate reach. TCG recognizes the value and importance of multiparty dialogue and experience sharing in proactively dealing with our common challenges, and has been engaged with UNGC's local network in Bangladesh, which we look forward to deepen in the coming year. All these efforts are reflected most poignantly by the visibly greater engagement and awareness demonstrated within our entire team, who have taken these issues to heart, and truly made sustainability a core part of our company's culture. I am proud to be able to say that TCG has truly developed into an organization that pursues both profitability and positive social impact as fundamental and compatible goals and values.

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.

A handwritten signature in black ink, appearing to read "Naila Chowdhury". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Naila Chowdhury
Chairman
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".

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 is seeking to extend its activities in support of marginalized groups through the development of its "Legal Helpline" project. Implementation plans and project proposals for this initiative have been developed, with the goal of implanting this in the coming year.

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.

- 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.
- TCG joined a working group under the heading 'Committee for Human Rights &

Labor Issues' with the UNGC local network in Bangladesh, during the UNGCLN Bangladesh 1st Steering Committee Meeting (January 21, 2013, at the Bangladesh Enterprise Institute)

- 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.
- TCG Chairman Ms. Naila Chowdhury remains actively involved in developing partnerships that can support TCG's efforts to make a positive impact on the human rights scenario in Bangladesh. In March 2012, she 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, launched on the 23rd of September 2012, has developed to its final stage, and has already responded to several hundred calls over the past year. Having strengthened the project's operations in light of the experiences of the past year, and with the support of new partnerships, a mass promotion campaign will be implemented in the coming months to maximize the reach and impact made by this initiative in address human rights related and other issues faced by women and girls across Bangladesh.
- The team of special needs persons (victims and survivors of gender based violence) from the Acid Survivors' Foundation recruited previously, and are now working full time with TCG, and have become successfully integrated with the team. This is part of TCG's ongoing effort to integrate persons marginalized by human rights abuse.
- 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 previous years, 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. This past year, TCG has continued to review these policies and developed Standard Operating Procedures (SOPs) to promote better worker-management relationships, and created new channels to improve communication and understanding across the team. 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 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, as well as bonuses for work done on public holidays.

- *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, TCG also works to break down economic class based discrimination, ensuring that all staff are treated with equal respect.

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.
- Standard Operating Procedures have been developed to promote better

management-staff relations, and multiple new communications channels have been implemented to ensure that all staff members have the opportunity to be heard.

- 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.
- TCG continues working with its previously established team of special needs persons. Our experiences over the past year have been very positive in this regard, highlighting the exceptionally supportive work environment has been effectively established. 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 continued training, supportive policies, and an ongoing commitment to greater workplace sensitivity, they are now a fully integrated part of the TCG team.
- TCG joined a working group under the heading 'Committee for Human Rights & Labor Issues' with the UNGC local network in Bangladesh, during the UNGCLN Bangladesh 1st Steering Committee Meeting (January 21, 2013, at the Bangladesh Enterprise Institute)
- TCG is seeking to extend its activities in support of marginalized groups through the development of its "Women & IT" project. Implementation plans and project proposals for this initiative have been developed, with the goal of implanting this in the coming year.
- 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.

Assessment, policy and goals:

TeleConsult Group is very conscious of the ecological impact its operations have. While its activities as a technology services company are not do 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*

Taking a precautionary approach for TCG means factoring in potential environmental impact during strategic planning, and being proactive to adopt choices that promote efficiency and minimize waste.

- *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).
- Although TCG's facilities operate 24/7, new policies have been adopted to shut down parts of the TCG premises during off-peak hours to minimize unnecessary energy consumption,
- Avoidable travel to the workplace minimized by utilizing separate offices in different locations, and encouraging remote working and video conferencing where appropriate.
- 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 measurable 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
- Despite increasing scale of operations, overall energy consumption has been reduced,

Assessment, policy and goals:

TeleConsult Group sets a very high standard for ethical practice amongst its entire team, which is reinforced by regular audits. TCG's approach in furthering its anti-corruption agenda are based around building up its internal culture in this regard, as well as the development of a system of checks and balances. Morality is a core value of the company, and care is taken to make sure all new members of the TCG team share this attribute. 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:

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

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

Not only is integrity considered a fundamental requirement for all staff members and actively promoted as part of the company's culture, TCG is also taking more systematic measures to increase accountability and oversight in this regard.

The following specific measures have been taken in support of UNGC's principles regarding anti-corruption:

- 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.
- Over the past year, internal accounting and document management systems have been bolstered to promote transparency.
- Standard contracts used with partners and suppliers have been amended to emphasize the company's anti-corruption stance
- A legal advisor has been retained to provide guidance regarding applications and

other processes that the company does not have experience in dealing with, to ensure that no space for malpractice.

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.