



INDUSTRIAL AREA ROAD A OFF ENTERPRISE ROAD P.O. BOX 2612-00200 NAIROBI KENYA.

MOBILE: +254-20 2627188; +254-721 797108; +254 733 720123 EMAIL: info@oddmaceng.com

19th October 2013

GF.1306.002

To our stakeholders:

RE: SUBMISSION OF ANNUAL COMMUNICATION ON PROGRESS (COP)
NOVEMBER 2013-2014

On behalf of ODD-MAC Engineering Ltd, I would like to reaffirm our commitment and support to the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Attached is our annual Communication on Progress which details our continuous and deliberate efforts to integrate these principles into our day to day business activities and into our overall company strategy.

All efforts are made to communicate these to our clients, suppliers and business partners.

Sincerely yours,

L. O. OMOSO
MANAGING DIRECTOR
ODD-MAC ENGINEERING LIMITED

Human Rights Principles

ODD-MAC fully supports and respects both local and international human rights principles. We have made great strides in this area in the last few years by developing internal control policies to manage and review its implementation.

Assessment, Policy and Goals

Respect for Human Rights form a critical aspect in the management of our business activities. For this reason, ODD-MAC QMS (Quality Management System) Policy 2013 includes a whole chapter on Code of Conduct. This is to respond to the modern day challenges posed by human rights abuses around the work place.

In our code of conduct we specifically outline the rules and regulations by which each employee is expected to adhere to in the work place and in execution of his/her duties.

Our goal is to reduce the annual complaints of violations to the minimum possible; while responding to complaints raised in a timely and just manner.

Our QMS can be accessed on demand by requesting the managing director at the following email: info@oddmaceng.com.

Implementation

Human rights violations in the company have been limited within the company through the following measures:

1. Developing a Code of Conduct and integrating it into our QMS as mentioned above. This Code of Conduct observes international labour laws
2. We are active members of the Federation of Kenya Employers which is a nationally recognized body in Kenya that protects workers rights.
3. We organize annual conferences for our employees to attend and learn from external sources to improve awareness

Measurement of Outcomes

1. We have streamlined the complaints mechanism and methods of dealing with reported violations within the company while protecting the victims' rights
2. Regular audits, including internally by management, have revealed significant reduction in violations, improved employee awareness and general adherence to code of conduct.



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Labour Principles

ODD-MAC ENGINEERING LTD is committed to ensuring the following labour principles are adhered to:

1. The right to collective bargaining and association to the labour movement
2. Elimination of all forms of forced labour
3. Elimination of child labour
4. Elimination of discrimination at the work place in any form

Assessment, Policy and Goals

ODD-MAC Quality Management System (QMS) is developed to conform to international labour laws. It clearly outlines all labour rights, and rights to collective bargaining, health and safety.

Our terms of engagement with employees are clearly defined and documented in the QMS and covers aspects such as working hours, remunerations, leaves, benefits, appraisals etc

The company also aims to develop its workforce through various training programs organized both internally and externally. The purpose of this is to impact skills and to motivate employees to achieve their potential.

Implementation

The ODD-MAC QMS is an important document that clearly outlines our policies, goals and strategies with regards to employee management. For this reason, it is reviewed annually through management meetings or committees formed to collect employee views on its practicability and relevance.

We are members of the umbrella border for workers in Kenya i.e. Federation of Kenya Employers (FKE). This is a recognized institution that champions labour rights in the country. They also provide training to institutions and companies on labour laws.

Measurement of Outcomes

Progress is mainly measured through employee feedback mechanisms such as suggestion boxes and anonymity feedback forms. These two modes of communication with our workers usually give an agenda for our annual reviews of the QMS policy and we can better respond to our workers needs.



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We are happy to announce that in the year 2013, there has not been a single complaint with regards to labour violations.

We have never engaged any person under the age of eighteen and will not be a party to child labour. The management does not practice forced or compulsory labour.

Environmental Principles

ODD-MAC is a construction and engineering company, and we recognise that our activities have an impact on the environment arising from our consumption of raw material and subsequent generation of waste.

We therefore accept and acknowledge our obligations and responsibilities under legislation and guidance dealing with environmental issues that affect or arise in consequence of our business.

Assessment, Policy and Goals

ODD-MAC Environmental Management (EMP) policy 2013 applies to all activities carried out by staff and clients that are legally present within its work areas, (company offices and construction sites) or involved in the company's activities outside its designated areas.

The policy has clear guidelines for the following:

- Full compliance with both local and international Environmental laws in the execution of our activities
- Recognise and evaluate pollutant sources so as to prevent pollution
- Monitor and measure the important environmental impacts of its activities while constantly improve on its environmental performances
- Train and make aware all employees of the company of Environmental Management and Protection issues
- Set specific, measurable, achievable, realistic and time scheduled goals and take all necessary steps to attain them
- Continue developing and improving upon its Environmental Management Policy



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Implementation

The Environmental Management Policy adopted by the company is very detailed and begins with a signed statement from the Managing Director of the company. This makes it binding to employees at every level of management in the company. This statement is available to all employees.

We are also members of National Environmental Management Authority, NEMA, the body entrusted with managing the environment within Kenya.

Measurement of Outcomes

Projects are usually assessed to determine the environmental impact. These audits are usually done externally by NEMA making them reliable.

Internal audits of all projects are done through engineers and supervisors. These are usually reviewed in our annual reports and communicated to all relevant parties within the company.

ENGINEERING LIMITED



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Anti-corruption Principles

We are committed to elimination of all forms of corruption including extortion and bribery; as common practice, we preach zero tolerance to this vice.

Assessment, Policy and Goals

We recognize that in our business i.e. construction, corruption can be rampant. Our code of conduct specifically deals with bribery and issuance/ accepting of 'gifts'. It outlines how company employees are to carry themselves when confronted with such situations.

Implementation

All our employees are trained to observe the highest standards of ethics. We encourage transparency and accountability in all our projects.

Our partners, clients and suppliers are issued with anti-corruption commitment forms to sign as part of contract negotiations. This way, they know from the onset that we are not party to corrupt deals.

Measurement of Outcomes

Because of the clear policies we have implemented on anti-corruption, cases are very rare. In situations where our employees are confronted with such a case, they are trained to politely but firmly turn down such requests and make a report to their immediate supervisors.

Our clear stance on anti-corruption has clearly improved our output and integrity amongst our industry peers. In the year 2013, reported cases have been few, and these have been dealt with vigorously.