

The UN Global Compact Progress Report 2010

Status report 30 June 2010



Table of Contents

▶	Statement of continuing support.....	3
▶	1. Sphere of influence	4
▶	2. Valuing our clients	7
	▶ 2.1. Improving access to health care	8
	▶ 2.2. Affordable health care.....	11
▶	3. Valuing our employees.....	12
	▶ 3.1. Taking care of our employees' well-being.....	12
	▶ 3.2. Valuing our employees' point of view.....	16
	▶ 3.3. Aiming to be an attractive and equal opportunity employer....	17
▶	4. Valuing our environment.....	20
	▶ 4.1. Raising employees' awareness	20
▶	5. Our ethics.....	22
	▶ 5.1. Company code of conduct.....	22
	▶ 5.2. Combating money laundering.....	22
	▶ 5.3. Combating health insurance fraud.....	22
▶	Cross-reference table	24

Statement of continuing support

With an increasing number of offices and company representatives on all continents, we continue to support and live up to the UN Global Compact's principles in terms of human rights, labour and anti-corruption. The true challenge of our growth and development as a business, as is the case for many other corporations, lies in aligning our business goals with the pursuit of a sustainable global economy.

We managed to reduce our water consumption level in 2009 and in December 2009 we switched to the use of 100% green electricity at our head office in Belgium. Moreover, the increase of our activities and staff number builds a key factor that needs to be taken into account when evaluating evolutions in the production of waste and the use of natural resources.

Our growing sales force and business development activities resulted in substantially higher business travel, inevitably leading to higher CO₂ emissions. Despite the options offered by modern communication technology – which we use to our full advantage – regular visits to our clients basis remain necessary. To offset all our emissions, not only related to travel but to all our operations, we invest in a biomass project in India, an initiative we continue to support since 2006. As a result, we received a CO₂ neutrality certificate for 2009.

Apart from our previous efforts, new initiatives in 2009 were implemented to live up to our engagement to ensure the physical and mental well-being and safety of our employees. We completely refurbished the company cafeteria at our head office and we offered our staff in Belgium a wide variety of free-of-charge fitness courses during lunch break.

As an international health insurance provider, our goal remains to provide easy, affordable and global access to health care. As our industry is prone to high cost inflation, we are constantly looking for ways to contain costs. We do this by (re)negotiating the rates of medical service providers which are part of our constantly growing international network, by applying case management techniques, by monitoring health insurance plan consumption patterns and by preventing and detecting health insurance fraud.

We joined the UN Global Compact initiative in 2006. By publishing our Communication on Progress reports on our website and including them in our sales and marketing materials we want to make clear to all our stakeholders that we take our participation in the UN Global Compact to heart.

We remain committed to achieving sustainable and profitable growth by providing international employee benefits and health insurance products, solutions and services. We are fully aware that this is only possible if our offering represents an inherent good to our customers and their employees, and if the adverse environmental impact of some of our business practices are avoided or at least reduced to a minimum.

Rudi Bertels
Chief Executive Officer

1. Sphere of influence

Operations

Vanbreda International has over 50 years' experience in designing, implementing and managing cross-border employee benefits and health insurance programmes for private, public and not-for-profit organisations. These include companies with expatriate staff and offices in different countries and continents, intergovernmental organisations, diplomatic staff and foreign trade representatives as well as non-governmental organisations.

As a provider of insurance products, services and solutions, we are aware of the impact that our activities have on society, both nationally and globally. The United Nations Environment Programme Finance Initiative report 'Insuring for Sustainability' (UNEP FI, 2007), rightfully mentions that "the insurance industry is a strong lever for sustainability due to its size, the extent of its reach into the community and the significant role it plays in the economy."

By enabling economic actors to take risks and protect their assets, insurance stimulates investments and innovations. By providing financial protection against death and disability risks and annuities for retirees, insurance reduces the pressure on the public sector. By analysing risks, insurance signals danger and provides risk management advice. Last but not least, by investing collected premiums, insurance directly contributes to the economy.¹

"Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control."²

Transnational corporations and other business enterprises shall respect economic, social and cultural rights as well as civil and political rights and contribute to their realisation, in particular the rights to development, adequate food and drinking water, the highest attainable standard of physical and mental health, adequate housing, privacy, education, freedom of thought, conscience, and religion and freedom of opinion and expression, and shall refrain from actions which obstruct or impede the realization of those rights."³

Since our foundation, we emerged as a company with an ever-increasing global reach.

For our clients, we play a role in helping them implement their employee benefits strategy in line with their financial targets. We service over 345,000 people residing and working all over the globe. By providing global access to health care we touch upon and influence their daily lives and those of their families, wherever they work and live.

In addition to affecting our client's HR and business strategy and financial performance, and their employees well-being, we play a key role in the lives of our employees and their work environment. Our client services are being taken to heart, day in day out, by over 400 people.⁴ The majority works from our headquarters in Belgium, others are based in our offices or representations in the Netherlands, Germany, Italy, the UK, Switzerland, the United Arab Emirates, Kenya, South Africa, China, Singapore, Malaysia, Chile and the U.S.

¹ UNEP FI, 2007.

² Universal Declaration of Human Rights, article 25.

³ UN Norms on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 12.

⁴ Number of Vanbreda International employees per 31 December 2009, representing 365.29 full time equivalents.

Our commitment to act in a socially responsible way

Our commitment to act in a socially responsible way

We are committed to act in a socially responsible way. Our commitment is reflected in systems and initiatives that benefit all our stakeholders. We strongly believe in business ethics.

We support and pursue international principles and standards with regard to human rights, labour rights, environmental protection and ethical business conduct.⁵

We not only adhere to the United Nation's Global Compact principles, but also subscribe and live up to the Diversity Declaration of the Flemish Chamber of Commerce. In addition, with the Vanbreda group of companies⁶, we sponsor a corporate philanthropy programme of 500,000 EUR annually (2007-2011) allocated to projects which aim at protecting the underprivileged, funding scientific research and development assistance, and promoting health and education.

Moreover, we comply with all legislation and regulations that have a bearing on our activities and we act responsibly beyond what is legally required. Our adherence to the UNGC principles demonstrate that we strive to be a socially responsible service provider and employer.

We translated all of our engagements into our own specific set of commitments. Based on the principles of the 'Triple Bottom Line' (People, Planet and Profit) they represent our intentions with an eye to organisational as well as societal success.

⁵ We specially refer to:

- the [UN Norms](#) on the responsibilities of transnational corporations and other business enterprises with regard to human rights;
- the [International Labour Standards](#) of the International Labour Organization (ILO);
- the [Rio Declaration on Environment and Development](#);
- the [OECD Guidelines for Multinational Enterprises](#);
- the [UN Convention against Corruption](#);
- the [Universal Declaration of Human Rights \(UDHR\)](#).

⁶ Vanbreda International and Vanbreda Risk & Benefits.

Vanbreda International is a partner of UNICEF Belgium

For many years, Vanbreda International has sponsored UNICEF by donating 10 EUR for each customer satisfaction survey duly completed by its clients. Thanks to these contributions we were already an officially recognised 'major sponsor' of UNICEF Belgium.

In 2007, UNICEF Belgium and Vanbreda International joined forces and concluded a three-year partnership agreement, which will be evaluated in October 2010. Vanbreda International's annual donation of 30,000 EUR is being allocated to very specific health care projects in the Democratic Republic of Congo (DRC).

Since the beginning of 2008, our donations have been used for a project called 'Child survival and development activities in two health care zones in Katanga – DR Congo'. The project aims at reducing child mortality in two specific zones in Katanga, namely Moba and Kitenge.

Child mortality figures worldwide and for the DRC still appal today. Worldwide 9.4 million children die from preventable and treatable diseases. 40% of them do not survive their first month of existence. In the DRC, one fifth of the children die before the age of five.

Some of the measures to reduce child mortality seem easy to implement and relate to what we consider to be very basic health and living conditions such as the availability of safe drinking water and mosquito nets, and washing hands before meals.

The project that we sponsor aims at implementing a basic health care system for 491,279 people, and help 92,851 children under the age of 5 and 19,651 pregnant women. It wants to substantially increase the number of DTCHepB3 vaccinations to the level of 80% of all children of less than one year old and the use of impregnated mosquito nets. It looks at expanding medical care at home or in a health care center, ensuring exclusive breast feeding and washing hands, providing qualified medical assistance at childbirths and adequate care for malnourished children, performing HIV/AIDS tests and last but not least, educating people on healthy conditions.

In 2009, the project succeeded to finance and provide 60 kits of essential drugs, 20,640 mosquito nets and 6 refrigerators for the cold chain equipment. In the healthcare zone Moba, 30 healthcare workers attended a specialised training (PMTCT training), whereas the PMTCT services were implemented in Moba in three new health care zones. The obstetrical services in 42 health care centers were reorganised, including reinforcement of health care worker capacities.

Our contribution for 2009 equals the value of three new refrigerators and the maintenance of the cold chain equipment in both health care zones above-mentioned.

2. Valuing our clients

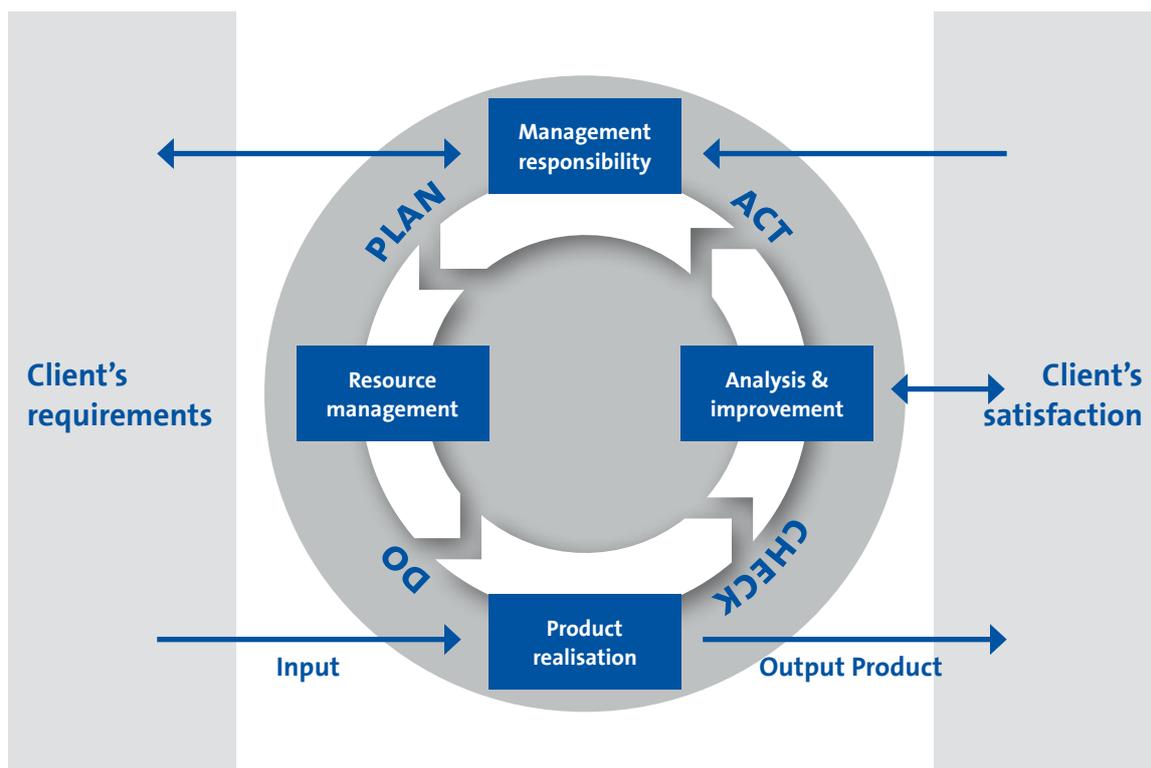
We want to ensure easy and affordable access to worldwide health care and reduce barriers to health care and protection wherever possible. At the same time, we raise plan members' awareness of the cost of health care plans and how they can contribute to keeping these costs down. In addition we foresee measures and mechanisms to discourage and discover insurance fraud.

Our solutions are designed to enable staff covered by a health insurance or wider employee benefits programme to optimally benefit from the plan's advantages. By upgrading and fine-tuning these plans and by launching new products and services, we continuously improve the plan's and product's experience and cost impact.

Our strive towards continuous improvement is reflected in our ISO certification which we obtained in 1998 for employee benefits claims handling.⁷ Ever since, this certification was renewed every three years. The latest re-certification was awarded in 2010 and was granted without any Corrective Action Measure, which is exceptional.⁸

⁷ Certificate BE98/01053 - SGS European Quality Certification Institute E.E.S.V.

⁸ Based on the new ISO standards ISO 9001:2008



As an ISO certified company we have a fully maintained quality system in place that is based on quality design in the business process (PLAN), execution of the business process in accordance with quality guidelines as described in the quality handbook (DO), monitoring of the output with measurable and significant quality criteria (CHECK) and constant process improvement (ACT).⁹

⁹ For more information on ISO, see www.iso.org.

2.1. Improving access to health care

We have a significant impact on the extent to which our clients' employees and their families are covered against health risks. Our health care plans are designed taking local specificities and cultural diversities, therapeutic freedom and cost effectiveness into account.

To provide sound advice on how cover can be improved for plan members, we check medical expenses, invest in relevant surveys and closely monitor emerging health care needs.

Checking medical expenses

When reimbursing medical claims to health care plan members we always assess whether the expenses made are justified. First of all, we verify whether the treatment itself was justified, taking into account the underlying diagnosis. Secondly, we assess whether the expenses comply with levels that are reasonable and customary in the country where the treatment was given. These assessments require a continuous follow-up of health care developments and related costs worldwide. We are supported in this effort by our global network of 148 medical correspondents, including new local specialists in the Philippines, Afghanistan, India and Brazil.

Increased 'medicalisation' of Vanbreda International

Vanbreda International is specialised in health insurance services to expatriates worldwide and is trying to meet an increasing customer demand for health management and advice. Therefore, we decided to make the extension of our Medical Board a top priority.

Apart from the medical consultants in Belgium, Italy, Chile and Malaysia, our in-house medical board is now extended with medical consultants in the Philippines, India and Afghanistan. In the near future, they will be joined by colleagues in Brazil and Senegal.

This extension confirms our strong global position and presence when it comes to the knowledge of regional medical cultures, the follow-up of reasonable and customary expenses, case management and the detection of possible fraud.

Case management network expanded to South Africa

On top of the expanded medical correspondent network, steps have recently been taken to further extend the Vanbreda International network of case managers, the majority of which today is working at the company's headquarters in Belgium.

The case managers' team is now further completed with our overseas colleague who will be working from Johannesburg, South Africa. She will focus on assisting African plan members who are in need of an evacuation from other countries to South Africa, where the best possible medical care can be warranted.

These patients will benefit from a personal follow-up on the evacuation, the stay and the medical care provided.

Surveys on specific topics

Our clients expect our advice to be well-founded and realistic. To this end, we make use of our extensive database of medical information to make analyses and organise surveys on specific topics such as preventive care, disease management, the impact of ageing on health care costs, trends in disability management and return to work policies and other topics. We work closely with specialised institutions or academics to perform these surveys.

Proximity to clients

In recent years, Vanbreda International has made substantial investments to be close to where its clients and plan members are based by opening additional sales and claims processing offices, hiring local representatives and extending its international network of medical correspondents.

Today, we have local offices, sales and/or local representatives in Europe (Belgium (headquarters), the Netherlands, Germany, Italy, Switzerland and the UK), the Middle East (the United Arab Emirates), Africa (Kenya and South Africa), Asia (China, Malaysia and Singapore), Latin America (Chile) and the U.S. (Florida).

With Claims Processing Offices in Kuala Lumpur (Malaysia), Antwerp (Belgium) and Miami, we have regional Claims Offices in three time zones so that our customers globally have the best possible access to us for communication and smooth claims handling purposes.

Since we opened our Miami-based Claims Office, the number of local employees increased to fourteen currently (June 2010).

Regular assessment of health care needs

Every year we perform a detailed analysis of each client's medical claims history. These analyses can reveal new cover needs that had not yet been included in the health care plan. In such cases, we will advise our clients to adjust their plans to better meet the health care requirements of their employees and their families. At the same time, the analyses of the plan's experience help to raise awareness about the cost of the plan both for employers and employees.

Disease management

The prevalence of chronic conditions has increased worldwide. These conditions usually require careful monitoring and management. We believe that education and awareness are a first step in preventing and managing chronic diseases.

To provide plan members with information about causes, symptoms and treatment of such diseases, we dedicated a specific section on our website to HIV/AIDS, diabetes, Parkinson, asthma, chronic obstructive pulmonary disease and cardiovascular diseases. Plan members can also ask questions with regard to these diseases.

Disease Management – pilot project for HIV/AIDS patients

It has always been a top priority for us and our clients to provide HIV/AIDS patients with an optimal health care access without concerns regarding the financial aspect, confidentiality or stigma.

In that respect, we initiated a pilot project for one of our clients. It consists of disease management in tight cooperation with the patient's treating physician, and of psychological and treatment advice.

In practice, the first step is to identify the affected plan members. In this respect, on-site VCT sessions are organised, the results of which are used to interact with the patients directly, without involvement of the client. Once in the program, the patients are guided and granted access to the best possible (proactive) medical care. The patient's health is actively followed up and managed, by monitoring lab results and controlling the intake of medication. Moreover, the pilot project foresees triggers to encourage the patients involved to continue their treatment, e.g. via SMS.

On top of that, patients in the project are entitled to the following services:

- 24/7 access to a dedicated call centre for assistance;
- access to psychological assistance to manage that aspect of the disease and its consequences.

To turn this project into a lasting success, we teamed up with Right To Care (RTC) as a partner. RTC is a well-established provider of HIV and AIDS Disease Management Services in South Africa and has extensive business and professional relationships with other service providers in Africa.

For Vanbreda International, the program is followed up closely by one of the members of our Medical Board who has a wealth of experience with medical care and the specific situation in Africa.

For this pilot project, which started in April 2010, ten African countries were selected: South Africa, Malawi, Mozambique, Zambia, Zimbabwe, Kenya, Tanzania, Uganda, Ghana and Nigeria. After one year, the project will be evaluated with the client and extensions to other countries will be considered.

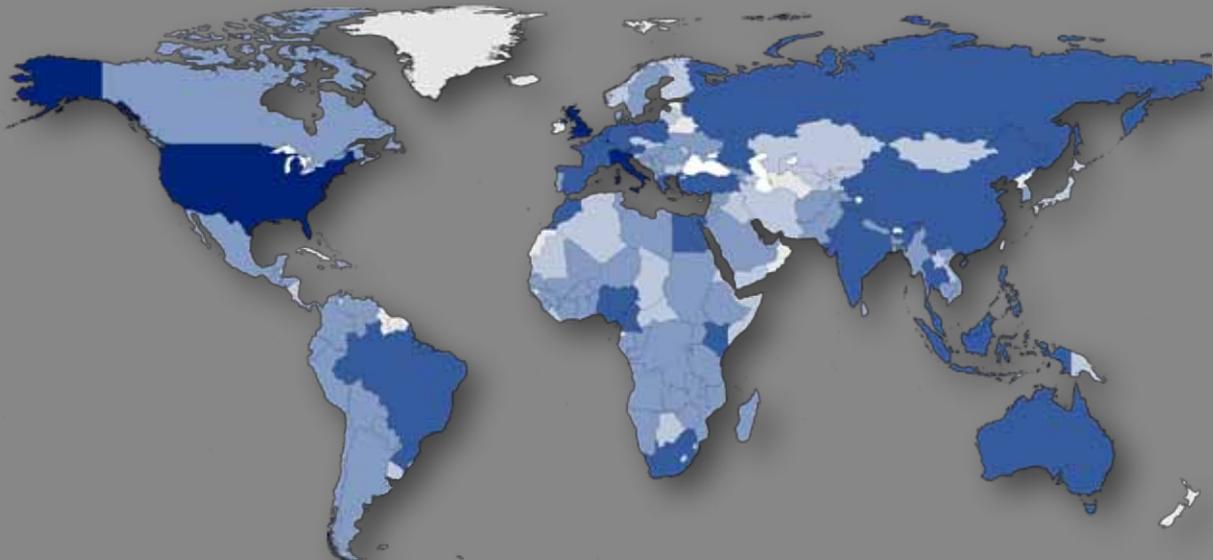
2.2. Affordable health care

Our Provider Relations department manages and monitors the worldwide Vanbreda International network of medical service providers. This network grows with the needs of existing and new clients. Providers who sign up to our network agree to apply direct payment for our plan members and/or preferential rates for the health care services they provide. In June 2010, Vanbreda International had 7,816 direct payment and/or preferential rate agreements with medical service providers worldwide.

The maintenance and further development of such a provider network would not be possible without optimal relationships with and proximity to those providers worldwide. To achieve this, we largely invest in face-to-face contact between our Medical Network Managers and the providers that we conclude agreements with. Between July 2009 and June 2010, we thus visited 490 medical service providers in 45 different countries.

The importance of Vanbreda International’s direct payment agreements

Direct payment agreements ensure that we pay hospital bills directly and promptly to the medical service provider. This service facilitates access to health care as it reduces out-of-pocket expenses for plan members and thus the financial impact. Furthermore, Vanbreda International has agreed preferential rates with many providers to keep health care costs under control. This has a positive impact on the aggregate claims expenditure and limits premium and contribution increases for health care plan members and their employers.



Counts of medical service providers we have an agreement with
 All Providers - June 2010

Dark Blue	300 > 3,000
Medium Blue	30 > 300
Light Blue	5 > 30
Very Light Blue	1 > 5

3. Valuing our employees

3.1. Taking care of our employees' well-being

Our employees are at the heart of our activities and they represent our most precious asset. We consider their well-being of paramount importance.

“Transnational corporations and other business enterprises shall provide a safe and healthy working environment as set forth in relevant international instruments and national legislation as well as international human rights and humanitarian law.”¹⁰

Our policies are aligned with international principles as well as national legislation. In Belgium, our headquarters' home country, the “Welzijnswet” imposes the implementation of a well-being policy for all Belgian employers. Article 4 of this law states that well-being consists of the following aspects: safety, health, psychosocial pressure, ergonomics, hygiene, enhancement of the workplace, environment, and the avoidance of violence, bullying and sexual harassment. For violence, bullying and sexual harassment, a specific legal framework was designed.¹¹

To comply with both our policies and legislation, we have established three bodies responsible for creating a good, safe and healthy place to work.

- **The Committee for Prevention and Safety at Work (Comité voor Preventie en Bescherming op het Werk – CPBW)**
This is a consultative body (consisting of the employer and its employees) that is up to date on all health and safety aspects, gives advice and investigates industrial accidents.
- **The Internal Department for Prevention and Safety at Work (Interne Dienst voor Preventie en Bescherming op het Werk – IDPBW)**
This department not only provides information and advice to Vanbreda International, but also bears a number of legal responsibilities in terms of safety.
- **The External Service for Prevention and Safety at Work (Externe Dienst voor Preventie en Bescherming op het Werk – EDPBW)**
This service is responsible for all health-related and medical aspects.

We established a prevention policy, aimed at taking care of the physical and mental health of our employees and calling upon every employee to help ensure the health safety and well-being of their colleagues and themselves and to maintain a clean and environmental friendly workplace.¹²

Implementation of a preventive policy on drugs and alcohol

On top of the above-mentioned preventive measures, a policy on drugs and alcohol took effect on 1 April 2010. This implementation was motivated by the reality that work-related use of alcohol or drugs is one of the factors which can negatively influence the safety, health and well-being of employees and their environment. In addition, it can also have a negative impact on the productivity and the quality of the work, and this in turn can harm the image of our company.

The means enabling us to put these ideas into practice are based on a combination of labour regulations and practical provisions, targeted at promoting physical and mental well-being.

¹⁰ UN Norms on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 7.

¹¹ Law of 11 June 2002 and Royal Decree of 11 July 2002 on the protection against violence, bullying and sexual harassment at work.

¹² Vanbreda International's prevention policy is laid out in its Policy statement on well-being.

Physical well-being

- Employees' safety

New employees are informed about our safety guidelines, and how to identify, evaluate and appropriately act upon dangers and risks. We stress the importance and regularly remind employees of order and tidiness guidelines. One of these is the 'clean desk' policy, as an orderly workplace is a first condition to prevent accidents and provide easy access to fire extinguishers and emergency exits.

Since not all accidents or injuries can be avoided, we work closely with an external service for work-related accidents. Each incident is evaluated and results in an improvement of preventive measures whenever possible. Employees are encouraged to report defects, complaints and suggestions for improvement via dedicated communication channels.

The following table includes the number of employee accidents at work and on the road to work for the last five years.

	Accidents at work	Accidents on the road to work
2009	0	4
2008	2	10
2007	2	5
2006	2	6
2005	6	5

On a regular basis, Vanbreda International organises fire drills for the fire intervention team and the people in charge of evacuation and first aid. These exercises relate to fire prevention, reporting a fire, warning about fire, different types of fire, appropriate extinguishing agents, familiarity with the layout of the building and evacuation instructions.

Every month, all alarm signals are tested. After each fire drill a performance report is written and discussed with the Committee for Prevention and Safety at Work.

- Internal medical service

On a two-weekly basis, an Occupational Health Physician (OHP) and nurse are present at our offices. The OHP examines new employees, follows up on prolonged sickness and gives all staff working with computer screens a sight test every three to five years.

He is also responsible for the annual influenza vaccination campaign. In 2009, 78 employees working at our headquarters were vaccinated. In other words, the number of vaccinations further increased when compared to 2008, which already showed a 100% growth of the 2007 result. Finally, the OHP is available for employees who wish to consult him about work-related medical complaints.

From the age of 40, all employees are entitled to a complete medical check-up every 3 year.

2009 will to a considerable extent be remembered as the year in which Influenza A(H1N1) emerged and was identified as a possible pandemic. As an international corporation working worldwide and serving customers and plan members around the globe, the company's Crisis Management Team from the very beginning of this crisis identified the necessary measures according to the WHO's level of alert and in line with its Business Continuity Plan.

Employees were regularly informed where they could find information about the pandemic and were instructed what to do in case they developed flu-like symptoms or had been in touch with someone diagnosed with the virus. We installed a dedicated phone number in case governments would issue measures making it more difficult to access or contact the company.

Further investment in in-house medical emergency equipment

Two Automated External Defibrillators or AED appliances were placed on strategic places within the building, being on the top floor where the cafeteria is and on the ground floor next to the reception. In order to make sure that these appliances are handled correctly, our team of first aiders will receive an extra training to provide first assistance before the emergency services can take over treatment of the patient.

- Group insurance

Our employee benefits package at the main office in Belgium includes an extensive group insurance that covers expenses related to hospitalisation and work incapacity, as well as an indemnification in the event of death. Moreover, we pay contributions to a pension fund supplementary to the national system.

At the Miami office, full-time employees and their family members can affiliate to three plans (incl. a dental plan) underwritten by the company.

In Kuala Lumpur, the employees upon approval by the insurer will be covered under the Group Term Life with supplementary cover of permanent and partial disability.

The Company contributes to a local insurance company for a Basic Group Medical Plan, outpatient general practitioner benefits and outpatient specialist benefits. The cover is within Malaysia. All employees and their children until the age of 21 are covered under this medical plan.

- Non-smoking policy

Our labour regulations include a smoking ban in all offices.

- Preventive alcohol and drug policy

As of 1 April 2010 a preventive alcohol and drug policy was included in the labour regulations for our Antwerp headquarters because work-related alcohol and drug use are possible factor to negatively affect the safety, health and well-being of the employee and his or her environment.

On top of that, it might also have a negative impact on the productivity and the work-quality and, as such, on our image as a company.

Mainly, this policy has been established as a means of prevention.

In its commitment to provide its employees with a safe and productive workspace, a similar, strict approach towards 'substance abuse' has been implemented by Vanbreda International LLC for the Miami offices.

- Ergonomics, health and comfort

We attach great importance to ergonomics. The following extract from our ISO quality manual reflects this concern: "Creating a pleasant working environment is key to Vanbreda International. The Workplace Health and Safety Adviser ensures that all employees are able to work in the best possible conditions."

To eliminate ergonomic risks, our Internal Department for Prevention and Safety at Work gives general as well as personalised advice on taking preventive measures. Such measures include positioning computer screens to avoid flickering and allow proper lighting, and finding the right furniture to support correct posture. Employees are informed of the symptoms of Repetitive Strain Injury, eye disorders and other typical health problems associated with poor ergonomics. They are encouraged to prevent these injuries or to address them by taking the appropriate measures. To this end, we invest in high-quality ergonomic office furniture for all employees. The ergonomist visits our headquarters six times per year.

As in every service company, our employees spend a considerable amount of time in front of PC screens. We have replaced all PC screens with individually adjustable LCD screens to improve our employees' visual comfort. Compared to traditional PC screens, LCD screens offer a better picture quality, produce no electromagnetic radiation and considerably less heat, and are less sensitive to reflection. Moreover, they are more energy efficient. Employees who frequently use their PC received a second screen as this leads to less printing and increases user comfort

- Promoting physical exercise

We encourage our employees to stay fit and exercise. Employees who come to work by bike are financially rewarded. Taking effect on 1 January 2010, the bicycle allowance per kilometre was raised by 33%.

In 2007, we launched our Sports Plan, a company-wide initiative to encourage our employees to improve their physical condition.

Within the framework of the Sports Plan, we took a number of initiatives:

- we negotiated an agreement with a local fitness centre so that employees enjoy a substantial discount;
- we took part in 'Bicycle day', an initiative organised by the city of Antwerp, Belgium to encourage people to leave their car at home and go to work by bike;
- Vanbreda International in 2010 offered its staff free access to a nearby health & fitness centre during lunch break. Each day, a different course could be attended varying from 'Boxing physics' or 'Spinning' to 'Abdomix' muscle training. In addition to the organised sessions, our employees were also able to use the fitness facilities on an individual basis.

Opening of the renewed company cafeteria

To support a more comprehensive approach to our employees' health and fitness, we decided to offer more than just sports facilities by opening our new company cafeteria on 1 October 2009. The menu is both healthy and diverse including fresh fruit every day and fresh soup that are free of charge. On top of that, employees can choose from a wide variety of salads, sandwiches, pastry and desserts.

Mental well-being

- Protection of personal integrity

In line with international and national law, we have set up a specific procedure to protect employees against violence, bullying and sexual harassment at work which is applicable in our offices worldwide. We included the complaint procedure in our labour regulations, whereas a personal confidant was installed who can be contacted by possibly victimised employees.

- Sustainable work–life balance

“Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.”¹³

In support of the above principle, our labour regulations and collective labour agreements allow several possibilities to improve employees’ work–life balance. Depending on local labour practice, laws and legislation, these include options such as flex time, a choice of part-time packages, and time credit/career breaks.

- Social events

In order to create a good working atmosphere at our Antwerp headquarters, we uphold a tradition of organising social events on a regular basis such as company parties, team-building activities and cultural events.

This tradition which is a part of who we are as a company is carried on obviously in our offices in Kuala Lumpur and Miami where family days, corporate parties and end-of-the-year events have been included in the calendar.

3.2. Valuing our employees’ point of view

We endorse the international principles of freedom of association and collective bargaining as described in the Universal Declaration of Human Rights and the UN Norms on the responsibilities of international corporations and other business enterprises with regard to human rights.

“Everyone has the right to form and to join trade unions for the protection of his interests.

Transnational corporations and other business enterprises shall ensure freedom of association and effective recognition of the right to collective bargaining by protecting the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without distinction, previous authorization, or interference, for the protection of their employment interests and for other collective bargaining purposes as provided in national legislation and the relevant conventions of the International Labour Organization.”¹⁴

We encourage an open and constructive dialogue between employer and employees. In line with the relevant national legislation¹⁵, our internal regulations describe the composition and duties of the Works Council (*Ondernemingsraad*).

¹³ Universal Declaration of Human Rights, article 20.

¹⁴ UN Norms on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 9.

¹⁵ Bedrijfsorganisatiewet (1948), Royal Decree of 15 May 2003 and of 27 November 1973.

3.3. Aiming to be an attractive and equal opportunity employer

“Transnational corporations and other business enterprises shall ensure equality of opportunity and treatment, as provided in the relevant international instruments and national legislation as well as international human rights law, for the purpose of eliminating discrimination based on race, colour, sex, language, religion, political opinion, national or social origin, social status, indigenous status, disability, age – except for children, who may be given greater protection – or other status of the individual unrelated to the inherent requirements to perform the job, or of complying with special measures designed to overcome past discrimination against certain groups.”¹⁶

We support international standards on equal employment and remuneration opportunities. Consequently, we aim to provide fair remuneration and growth opportunities, and to foster diversity.

A fair and competitive remuneration package for everyone

“Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.”¹⁷

“Transnational corporations and other business enterprises shall provide workers with remuneration that ensures an adequate standard of living for them and their families. Such remuneration shall take due account of their needs for adequate living conditions with a view towards progressive improvement.”¹⁸

We apply a remuneration policy based on objective criteria such as responsibilities, skills, expertise, experience and personal performance.

We provide a broad package of fringe benefits to all employees. Depending on local legislation and ‘good employer’ practice, this may include group insurance (pension/death), health care benefits and protection against work incapacity.

Salaries and fringe benefits are being determined without taking into consideration or discriminating against gender, religion, ethnic background or physical handicap.

Every individual staff member is entitled to transparency concerning his or her remuneration package. We will use appropriate means to offer this transparency, such as a correct and detailed employment contract, staff rules, collective bargaining agreements, internal communication vehicles such as an intranet, and personal benefit statements.

Training and personal growth

Continuous learning opportunities are an important motivator and a condition for job satisfaction. We attach great importance to the professional and personal development of our employees.

Each new employee completes a training schedule aimed at acquiring the knowledge and skills required in several fields (commercial, technical, administration, communication). Employees with new responsibilities or in need of developing additional skills receive appropriate internal or external training. All types of training are registered, monitored and evaluated.

In 2009, Vanbreda International organised a total of 1,307 training days, which corresponds to 3,71 training days per employee. We especially invested in in-house language courses offered throughout the year (except for the school holidays) during lunch time. Participants can choose between English, French, German and Dutch (for the employees who do not have Dutch as their native language).

Apart from language training, PC skills and medical terminology remain important focus points in our training offer.

¹⁶ [UN Norms](#) on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 2.

¹⁷ [Universal Declaration of Human Rights](#), article 23.

¹⁸ [UN Norms](#) on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 8.

The table below shows the total number of hours of training of our headquarters' staff for the calendar year 2009:

Type of training	Number of hours per type of training
General training	364
Study leave Vanbreda system	2590
Study leave legal system	500
PC training	734
Language training	2549
Skills	376
Technical training	2209

Education Savings Account

Since the academic year 2008-2009, Vanbreda International has decided to intensify its investment in up-skilling its management. Every academic year, each management staff member receives a credit on his/her personal Education Savings Account, which (s)he can spend on his/her professional development. The balance of this budget can be transferred to the next academic year.

Selecting the best people, regardless of nationality, ethnic background, age, gender or physical condition

“Transnational corporations and other business enterprises shall ensure equality of opportunity and treatment, as provided in the relevant international instruments and national legislation as well as international human rights law, for the purpose of eliminating discrimination based on race, colour, sex, language, religion, political opinion, national or social origin, social status, indigenous status, disability, age – except for children, who may be given greater protection – or other status of the individual unrelated to the inherent requirements to perform the job, or of complying with special measures designed to overcome past discrimination against certain groups.”¹⁹

- Equal remuneration

“Everyone, without any discrimination, has the right to equal pay for equal work.”²⁰

We endorse the collective labour agreement²¹ regarding the equal remuneration for male and female employees. This agreement is an integral part of our labour regulations. The principle of equal remuneration implies that for equal work of equal value every difference regarding the sexes is abolished. In practice, this means that we have committed ourselves to making sure that the company's performance review system does not lead to discrimination.

- Fostering diversity

We commit ourselves to fostering diversity among our employees and not to discriminate based on gender, age, nationality or ethnic background.

At the end of 2009, we employed people of more than 27 different nationalities and origins. Worldwide, 401 people work for Vanbreda International.

¹⁹ UN Norms on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 2.

²⁰ Universal Declaration of Human Rights, article 23.

²¹ CAO no 25 of 15 October 1975, modified by the CAO no 25 b of 19 December 2001.

Vanbreda International's age structure is as follows:

Age bracket	Number of employees
< 20 years	1
20 – 29 years	124
30 – 39 years	167
40 – 49 years	86
50 – 59 years	22

We signed the Diversity Declaration of the Employers' Platform for Diversity, a collaborative initiative of UNIZO (Flemish Union of Independent Entrepreneurs), VOKA (Flemish Chambers of Commerce) and VKW (Christian Employers' Organisation). Our company agrees with the basic principles of the Declaration and is making every effort to implement them within the organisation.

Specifically, our commitments are as follows:

- We seek to make our personnel policy as objective as possible. We achieve this by ensuring that:
 - the recruitment and selection process focuses on the competencies of candidates and offers equal opportunities to everyone;
 - training and developmental opportunities are the same for everyone;
 - the salary policy is non-discriminatory;
 - persons of foreign origin, persons with a work handicap and older employees, etc. can also apply for jobs and be hired.
- We evaluate how we formulate vacancies and which recruitment channels we use to reach a diverse group of candidates. We make the selection interview and the practical tests objective.
- We do not comply with discriminating conditions that are imposed by clients or other external parties.
- We demand respect for all employees and do not tolerate discrimination between colleagues on the basis of origin, age, gender and sexual preference, etc.
- Both inside and outside the company, we make people aware that we are a member of the 'Employers' Platform for Diversity'.

4. Valuing our environment

“Transnational corporations and other business enterprises shall carry out their activities in accordance with national laws, regulations, administrative practices and policies relating to the preservation of the environment of the countries in which they operate, as well as in accordance with relevant international agreements, principles, objectives, responsibilities and standards with regard to the environment as well as human rights, public health and safety, bioethics and the precautionary principle, and shall generally conduct their activities in a manner contributing to the wider goal of sustainable development.”²²

We comply with the ecological requirements determined by international principles, Belgian environmental legislation and the “Welzijnswet”. We have translated this commitment into systems to prevent, minimise and compensate any harmful impact on the environment. This includes initiatives at employee and company level.

4.1. Raising employees’ awareness

When joining our company, employees are informed of our environmental policy and their individual responsibility to conform to this policy. These responsibilities are related primarily to sorting waste on the one hand and saving natural resources on the other.

Sorting waste

We have set up detailed guidelines on how to sort and minimise waste. Separate bins for paper, glass, dangerous waste and organic material are placed within reach of every employee.

The following table displays the amounts of waste we produced in the period 2007-2009:

Type of waste	2009	2008	2007
Paper (for recycling)	41,200 kg	39,300 kg	13,000 kg
Organic waste	11 m ³	11 m ³	8 m ³
Plastics, metal and drink carton	11 m ³	11 m ³	8 m ³
Harmful waste	1 m ³	1 m ³	0,8 m ³
Other waste	94 m ³	94 m ³	67 m ³

Compared to 2008, the amounts of waste produced has remained stable.

Saving natural resources

Employees are explicitly encouraged to conserve energy by turning off lights and electric devices whenever possible, using heating and ventilation moderately, and avoiding the waste of water.

By means of financial and practical incentives, employees are encouraged to come to work by bike or public transport, or to carpool. The following table displays Vanbreda International’s annual consumption of natural resources:

Resource	2009	2008	2007
Electricity	1,004,500 KWh	935,800 KWh	925,600 KWh
Gas	728,600 KWh	698,600 KWh	427,500 KWh
Tap water	3,000 m ³	3,800 m ³	1,980 m ³

²² UN Norms on the responsibilities of transnational corporations and other business enterprises with regard to human rights, article 14.

The increase in gas consumption for the period 2007-2008 was mainly due to the exceptionally strong winter of 2008 and the Antwerp office renovation, whereas the increase in the water consumption was a result from our switch from bottled drinking water to tap water. In 2009, the energy use remained basically at the same level as in 2008. However, it is important to note that we switched to 100% green electricity in our main offices in Antwerp.

We provide the Belgian government with an annual environmental report on our performance in terms of waste production as well as emission and energy consumption (Integral Milieujaarverslag – IMJV).

Ecology – Vanbreda International receives ‘CO₂ Neutral’ Certificate

Ever since 2006, Vanbreda International has been implementing an increasing number of measures to live up to its commitment to achieve CO₂ neutrality. For the calendar year 2009, we obtained a CO₂ offsetting certificate for the compensation of each of the 1.303,70 tonnes of in-house CO₂ emissions.

Not only is this certificate the result of our financial support to a CO₂-reducing project in north India (see project description below), but also by implementing the following green measures:

- the promotion of carpooling and the use of public transport and bicycle for commuter traffic;
- the installation of an energy-saving warmth regulation, heating and cooling;
- the installation of automatic lighting timers in the hallways.

In the scope of these efforts, Vanbreda International decided to switch over to green power for its headquarters in December 2009.

CO₂ offsetting: financing of a CO₂-reducing project in Rajasthan, north India

Our staff frequently travel by air to visit clients and medical service providers worldwide. Moreover, we create a considerable CO₂ emission due to our daily business activities at our offices, our fleet and our employees' commuter traffic.

Cognisant of the substantial amount of CO₂ emissions thus caused, we started compensating the environmental damage by investing in CO₂ reducing projects in 2006.

Countering our CO₂ emissions means that for each ton of CO₂ discharged, we invest in a biomass project in India that corresponds to an equal reduction in CO₂ emissions. This project produces renewable energy from sustainably grown biomass from local agricultural products, such as rice husk, cotton stalk and paddy straw. Not only does this conversion generate 'green' power, it also contributes to the local economy. The project has received the official UNFCCC²³ certificate.

The table below shows the amounts of CO₂ compensated since 2007:

Year	Number of employees
2009	1.303,70
2008	1.019,30
2007	330,64



²³ United Nations Framework Convention on Climate Change: www.unfccc.int

5. Our ethics

We strive to set an example of ethical and transparent business conduct by taking initiatives in favour of ethical conduct of employees, combating money laundering and discouraging insurance fraud.

5.1. Company code of conduct

Our labour regulations describe our general commitment regarding attitude and conduct at work. New employees are clearly informed of these guidelines.

5.2. Combating money laundering

We comply with Belgian Anti-Money Laundering Legislation, which conforms with the relevant European Union directives. The legislation imposes a number of rules with a view to preventing money laundering.

An internal working group received certified training on these legislative requirements. They have drawn up a scenario for primary supervision and provided thorough training for all employees concerned.

5.3. Combating health insurance fraud

Health insurance, especially in an international context is typically prone to fraud.

Medical insurance fraud is a serious offence, which leads, in the long run, to other medical plan members becoming the major victims.

Protecting our clients' financial interests is one of our top priorities. To this end we developed a detailed anti-fraud policy aimed at preventing, detecting, investigating, reporting and recovering fraud.

We also joined the European Healthcare Fraud and Corruption Network (EHFCN), a Brussels-based organisation which forms an international network together with the Canadian and American Health Care Anti-Fraud Associations (CHCAA and NHCAA) engaged in the prevention, detection, investigation and prosecution of health care fraud.

Prevention

We have close working relationships with a worldwide network of medical service providers, whom we have thoroughly screened in terms of quality and trustworthiness. In addition, we count on the health care plan members' sense of responsibility to avoid fraudulent activities.

Detection

Our processing of health insurance claims includes various checks with the intent of minimising the risk of unjustified reimbursements. We assess each claim on the basis of what is typical, customary and reasonable. Thorough training and geographical specialisation, enable our claims analysts to recognise possible deviations at an early stage. We contact the medical service provider when necessary. The direct in-house availability of many languages and a vast range of documentation (databases; rates and tariffs; locally and internationally used codes for diagnoses, treatments and procedures; information on local health care systems, etc.) provide additional instruments for correct claims adjudication, cost containment and fraud control.

Investigation

During and after claims processing, a fraud investigation may be set up through our separate Fraud Investigation Unit. In the case of strong indications of fraud, special procedures are initiated to obtain written evidence.

Creating awareness

We appeal to the individual health care plan members to counter malicious practices and to work towards a balanced and financially healthy medical insurance plan. We guarantee strict confidentiality and a thorough investigation of each individual complaint.

Fraud Investigation Unit

To expedite and improve (potential) fraud detection, we created a dedicated Fraud Investigation Unit. Our Fraud Investigation Unit plays a vital role in our counter fraud approach. It:

- continuously updates our fraud policy and strategy;
- deals with the operational work involved in the thorough investigation of a file once it has been flagged as a potential fraud file;
- collects evidence to substantiate suspected fraud cases;
- takes the necessary actions to recover defrauded money and installs an anti-fraud culture amongst health care insurance plan members;
- ensures fraud reporting to the clients;
- improves fraud detection mechanisms for retrospective identification of fraudulent cases.

The Fraud Investigation Unit role is essential in order for us to increase our knowledge through practical experience of fraud problems tackled and to ensure that future preventative measures are up to date with the reality of the fraud risks that we face.

The Fraud Investigation Unit can also rely on international networks to keep themselves informed of all new health care fraud trends and techniques.

In practice, our Fraud Investigation Unit opens up eight new files each week. It closely cooperates with the medical claims units where possible fraud monitoring is an important part of the claims handling process as well and where new fraud files often will be initiated.

In July 2009 Vanbreda International joined the European Healthcare Fraud and Corruption Network (EHFCN), an international non-profit organisation based in Brussels. The EHFCN aims to reduce fraud and corruption in health care throughout Europe. By becoming a member of this international network we want to enhance our in-house expertise to combat fraud.

Cross-reference table

This table contains a cross-reference guide between the 10 principles of the UN Global Compact and Vanbreda International's Progress Report 2010.

Vanbreda International		UN Global Compact Principle: Business should ...		Page
2/3	Valuing our clients Valuing our employees	1/2	... support and respect the protection of internationally proclaimed human rights ... ensure that they are not complicit in human rights abuses	7 – 19
3	Valuing our employees	4/5	... support the elimination of all forms of forced and compulsory labour ... support the effective abolition of child labour	11 – 19
3	Valuing our employees	3	... uphold freedom of association and the effective recognition of the right to collective bargaining	11 – 19
3	Valuing our employees	6	... support the elimination of discrimination in respect of employment and occupation	11 – 19
4	Valuing our environment	7/8/9	... support a precautionary approach to environmental challenges ... undertake initiatives to promote greater environmental responsibility ... encourage the development and diffusion of environmentally friendly technologies	20 – 21
2/3/5	Valuing our clients Valuing our employees Our ethics	10	... work against corruption in all its forms, including extortion and bribery	7 – 19 22 – 23