

GAN Integrity Solutions

UN Global Compact Communication on Progress 2014

About GAN Integrity Solutions

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Country	Denmark	Membership date	10. June 2007
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GAN Integrity Solutions is a private consultancy & IT services firm with global experience in fight against fraud and corruption. Our company specialises in the area of Corporate Integrity, i.e. Business Ethics and offers services within the area of anti-corruption, anti-fraud, sustainability, and business development.

Our aim is to deliver practical solutions for companies. We help clients transform their policies into practices, coherent with the corporate values. GAN Integrity Solutions offers support to companies that wish to develop an in-house capability to increase their resistance to fraud and corruption and gain competitive advantages from their CSR agenda. Hence, the Global Compact (UNGC) Principles are central to what we do, even though the focus of our work lies on the 10th Anti-Corruption Principle.

GAN Integrity Solutions produces the Business Anti-Corruption Portal (BACP), which provides a number of comprehensive and practical tools and relevant information on how to avoid and fight corruption. We offer companies to make use of the BACP, which is intended to help companies avoid bribery and extortion by providing them with necessary information and anti-corruption instruments, free of charge. In addition, our firm creates courses for specific industries and professions and for both private and public sector clients in a variety of countries. Companies can use BACP as a corruption risk assessment tool. It is especially useful for small- and medium sized companies that lack an established internal integrity system to meet the demands for anti-corruption compliance from governmental institutions, business partners and civil society. We also support the compliance divisions of larger companies with our integrity e-learning courses and Compliance Management System (COMS).

We are committed to carry out pro bono work every year to promote different aspects of the UNGC. In the past year we have focused our efforts on establishing solid cooperation with non-governmental humanitarian organisations. We have supported the NGOs through workshops, anti-corruption guiding and consulting, opening a way for further cooperation and integration of our Compliance Management System. GAN Integrity Solutions is an active participant in Global Compact Working Group on Anti-Corruption and the Nordic Global Compact Network.



Executive Statement of continued support in 2013

GAN Integrity Solutions joined the UNGC 10 June 2007, and we continue to wholeheartedly support the Principles of the UNGC. We are committed to living out those principles as a business internally as well as with our work for clients.

GAN Integrity Solutions is committed to promoting corporate integrity. It is our core business to assist in developing and strengthening ethical practices and integrity systems, particularly in relation to business, but also more generally along the lines of the first nine UNGC Principles. We therefore constantly try to improve our action in these areas and to further deepen the integration of UNGC Principles with our business.

GAN Integrity Solutions' policy is to only work on projects, which we believe will be in accordance with the principles of the UNGC. Being complicit, either actively or passively, with a violation of UNGC Principles would undermine our core business. Should any potential real or theoretical conflicts between our work and UNGC Principles arise, they must be discussed and resolved internally to ensure the continued compliance of our work with UNGC Principles.

We firmly believe that belonging to the UNGC is helpful to our business and are proud to be part of such a worthwhile initiative.

Signature



Position **Partner**



Human Rights – Principles 1-2

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.

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

Assessment, Policy and Goals

GAN Integrity Solutions is committed to respecting and supporting human rights of our employees, suppliers and partners, and treat each party fairly and politely. We make sure to treat our employees with respect at all times. We strive to avoid discrimination and promote tolerance, transparency, and accountability, as well as to encourage freedom of expression in our organisation. In GAN Integrity Solutions, we always strive to maintain safe and healthy work environment.

Implementation

GAN Integrity Solutions is committed to protect and respect internationally proclaimed human rights, as defined by the UN Guiding Principles. We provide advice and support to all of our employees, including flexibility in working hours if needed for private matters, and fair tasks allocation, based strictly on the individual skills of each employee. We support social and mental well-being of our employees through arranging restaurant visits and small treats for all of our staff.

The length of the vacation period and the amount of working hours per week are allocated to each employee in consistency with the national legislation. As an internationally operating company we recognise our responsibility to ensure health and safety of our staff in all our operations and activities. We are committed to keep improving the internal processes of the company to make sure we maintain the high level of awareness about international human rights.

Measurements of Outcomes

GAN Integrity Solutions has not experienced any human rights related issues since its establishment; neither has it been subject to any investigations, legal cases or incidents involving human rights violations. We monitor and evaluate our sub-contractors, located outside Denmark, to ensure that decent working conditions are provided to their employees and that no human rights abuses, child labour, or discrimination take place at their facilities.

Labour – Principles 3–6

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5: Businesses should uphold the effective abolition of child labour.

Principle 6: Businesses should eliminate discrimination in respect of employment and occupation.

Assessment, Policy and Goals

All GAN Integrity Solutions employees have the right to freedom of association and collective bargaining. Being an international company and working with organisations from all over the world, we believe that we benefit the most from having employees that originate from different countries. We are strongly against discrimination in hiring and employment based on sexual orientation or gender identity. Our company is a strong mix of different nationalities, cultures, backgrounds and skills, which allow us to reflect the diversity of the clients we work with.

All employees in our firm receive a contract upon their employment, where a detailed description of the employment related issues, such as compensation, number of working hours, holidays and other conditions is provided. The national legislation concerning labour rights is enforced and carefully monitored in the countries where the company is active. We strive to provide a supportive and dynamic work environment, where everyone strives to perform with accountability, involvement, and efficiency and has an equal opportunity to develop professionally.

Implementation

GAN Integrity Solutions is committed to equality and diversity and prohibits any discrimination and harassment in all forms starting with our recruitment processes and throughout all the working processes and at the workplace. Executive decisions about recruitment, salary, bonuses and promotions are exclusively based on the individual performance of the candidates and employees, with all criteria for promotion being transparent.

GAN Integrity Solutions has made significant efforts to improve work environment for our employees. During the past year, the management of the company has initiated and performed the employee review and feedback meetings to assess employee satisfaction with the workplace and to offer an opportunity for all employees of the company to make suggestions for further improvement of the



company. These personal meetings were also used for the employees to voice their wishes for further personal and professional development and career growth, additionally to have an influence on their tasks. The employees have opportunities for training and guidance, whenever they feel it is necessary to enhance the quality of their work and take on new responsibilities.

Measurements of Outcomes

GAN Integrity Solutions has not been involved in any violations concerning labour rights. We have not been involved in any forms of forced or compulsory labour. Our firm has a tremendously high degree of academic, cultural, and social background diversity. According to the results of the employee review and feedback meetings conducted in 2013, employee satisfaction level with the work place has improved, contributing to an enhanced feeling of cooperation across departments and teamwork.



Environment – Principles 7–9

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

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

Assessment, Policy and Goals

GAN Integrity Solutions has a local office in Copenhagen with the field of work in consultancy; thus, our carbon footprint is relatively small. We are, however, motivated and highly committed to protecting and making a positive impact on the local environment, while conducting our daily business activities. We encourage our employees to use public transportation or bikes for everyday transportation and we do not own any vehicles. As an internationally operating company, we are aware of the CO2 emissions generated by business travelling and take this into consideration, when planning our participation in conferences, business meetings and integrity trainings.

Implementation

Whenever possible, GAN Integrity Solutions takes environmental issues into consideration in procurement. We constantly seek to influence the landlord towards environmentally friendly policies and practices in the building. Many of our initiatives have direct or indirect positive impact on the environment.

In order to increase the cost savings and lower the company's carbon footprint, we have implemented various policies, including diminishing the use of colour copies printed out, recycling materials and separation of waste. Almost all employees in our office have a possibility to use an additional screen on their desks, which greatly reduces amount of the printed out material. In GAN Integrity Solutions office we recycle and reuse various materials and our staff is conscious of a responsible energy and water use. To minimize food waste at the stage of consumption, we have established and integrated a system of thoroughly selecting and ordering the amount of food that fits the number of employees in the office on each individual week.



Measurements of Outcomes

In 2013, we have had relatively low CO2 emissions, and used only environmentally friendly materials, due to our effective environmental policies. By significantly decreasing the amount of food waste, we have also ensured that our contribution to climate environmental issues connected to food waste has been minimal in the past year.



Anti-corruption – Principle 10

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

Assessment, Policy and Goals

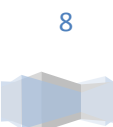
The fight against corruption and bribery forms the basis of GAN Integrity Solutions' consultancy work with clients, i.e. businesses and institutions, in their endeavours to implement and live up to their ethical principles. We actively support the UN Convention Against Corruption and will not participate in any corruption related activities. The major contribution of our company to global fight against corruption is the Business Anti-Corruption Portal (www.business-anti-corruption.com). The Portal was developed in 2006 with assistance from the Danish Foreign Ministry and operated by GAN ever since. The portal can help companies develop and maintain transparency in their external and internal business activities, especially when operating in unfamiliar developed or emerging markets. More than hundred business and corruption focused Country Profiles are available on the Portal and are regularly updated. The information is aimed at educating companies on corruption risks that exist in the process of interacting with the governmental institutions and associated officials in different settings. We cooperate with public and private sector actors in different countries and in order to fight crime and corrupt behaviour.

GAN Integrity Solutions offers various products such as risk assessment instruments, tools, integrity e-learning courses and compliance management systems to help companies develop zero tolerance towards extortion and bribery when conducting business in a foreign market.

Implementation

The Anti-Corruption Business Portal produced by GAN Integrity Solutions presents a wide variety of information and instruments on corruption issues that are available on the Portal's homepage for freely accessible training of the companies and their employees. As part of our firm's commitment to the UNGC, some new tools have been developed pro bono and made available on our website. Highly qualified staff members of our company are continually available for advising and consulting companies that wish to further improve their knowledge about bribery and corruption.

This year, GAN Integrity Solutions has consulted the private, international humanitarian organisation Medecins Sans Frontieres in the area of anti-bribery and anti-corruption compliance on the pro bono basis.



Constantly producing and innovating the anti-corruption tools and providing training and compliance services to other companies, our employees have a unique, specialised, and practical pool of knowledge and expert skills in the area of fighting and preventing corruption. Our valuable experience and strong commitment to follow the ideology of zero corruption tolerance in the everyday activities of the company helps us ensure continuous consistency with the UNGC Anti-Corruption Principle. Training of our employees and constant knowledge sharing through collaboration of different departments on the common tasks ensure awareness and involvement to the process.

Measurements of Outcomes

GAN Integrity Solutions has never been involved in any legal cases or violations involving any corruption issues. Internal legal advisers and consultants of our company ensure highly accurate implementation of and compliance to the anti-corruption principle of the Global Compact, while carrying out various business activities.

During the past year our employees have participated in several international events that had focus on fighting corruption to help businesses all over the world commit to sustainable and ethical business practices. In 2014, we plan to increase personal training of our employees to furthermore enhance the effectiveness of the company in its contribution to the global fight against corruption. We are dedicated to increase our cooperation with large-scale international companies and assist them to effectively enforce the anti-bribery Compliance Management System throughout their global supply chains.

On the following page the highlights of GAN Integrity Solutions' anti-corruption performance are outlined. In addition, a description of the development of the Anti-Corruption Tools Inventory to assist businesses and organisations in the implementation of the Global Compact's 10th principle is provided.



Case: Contributing to a sustainable business environment Pro Bono projects and global fight against corruption

GAN Integrity Solutions has been actively supporting development of fraud- and corruption free business environment across countries since 2004. We help companies establish a high level of regulatory and corporate compliance and manage corruption related internal and external risks in their supply chains. We believe that anti-bribery efforts can positively contribute to enhancement of companies' business performance, protect their brand and increase their social impact. We offer the Compliance Management System, integrity e-learning courses, and anti-corruption workshops - all aimed at educating top business leaders on how to avoid extortion and bribery and ensure consistency throughout their organizations.

We use knowledge and expertise of our employees to meet our social responsibilities in anti-corruption and anti-bribery compliance and help other companies to ensure consistency with their anti-corruption commitment. GAN Integrity Solutions produces the Business Anti-Corruption Portal (BACP) where it offers free information about corruption, as well as third party and agent screening tools (due diligence). We are committed to supporting international and regional legal frameworks. In 2010, the UK Bribery Act cited the BACP as the only tool for anti-corruption risk assessment in its UK Bribery Act 2010 Quick Start Guide.

We are committed to fight corruption and strive to deliver pro bono work that promotes decrease in global corruption and business environment free of fraud. We consult companies on the effects of corruption on economy and society and we present instruments that can help public and private organizations prevent conflict of interest and manage corruption risks with a special focus on the relevant anti-corruption legislation. Beside the freely available content about risks of business corruption in more than 100 countries on the BACP, we have developed several services and software tools that our pro bono clients can use to develop corporate compliance best practice.

One of the highlights of our work in the past year has been the cooperation with humanitarian non-profit organisations. We are committed to support relief non-governmental organisations that are dependent on public support to be able to carry out their activities when humanitarian crises or natural disasters happen. Our efforts are aimed at decreasing the number of financial risks associated with corruption. We are consulting NGOs in the area of anti-corruption compliance and offer training of their employees on how to avoid, recognize and deal with corruption risks in unfamiliar and unsecure environments and respond to extortion and demands for facilitation payments. By working with Médecins Sans Frontières on the pro bono basis this year, we have shown support for the organization and taken social responsibility for promoting human rights.

Our multi-cultural and multi-skilled group of employees together with our long-term experience allow us to offer highly professional training and effective monitoring of the results. Through this cooperation GAN



contributes to reinforcement of the cooperation between the public and private sector in the developing countries.

In the past year, the important publicly available online tool in corruption risk assessment of GAN Integrity Solutions – the Business Anti-Corruption Portal has expanded its content. In cooperation with the European Commission- Directorate-General Home Affairs, the information about corruption risks in different countries has been expanded by 33 new country profiles in various languages, greatly increasing the user traffic on the page and enhancing the potential global outreach of the BACP. We are dedicated to creating and supporting a stable network of public agencies and private firms, which can assist each other and collaborate in the area of fighting corruption. Our Annual Report outlines our performance and contains detailed information about our progress and achievements in the previous year.

Prospects for 2014

The 33 new country profiles were produced in 2013 on the grant provided by the contract between the EU Commission and the Swedish Ministry for Foreign Affairs. The EU contract, together with our new 2014 digital strategy, which includes extensive social media presence and further development of the BACP features, are expected to raise awareness of the risks of corruption and corruption issues amongst at least 100,000 European companies and more than 200,000 individuals over the next 3 years and greatly enhance our potential global outreach.

