

To Our Stakeholders

I am pleased to confirm that Saana Consulting reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Tom Pengelly



Managing Director  
Saana Consulting Ltd

## Human Rights

### Assessment, policy and goals

*Description of the relevance of human rights for the company (i.e. human rights risk-assessment).*

*Description of policies, public commitments and company goals on Human Rights.*

Saana is committed to ensuring that all our employees are committed to and influencing our business partners and clients to respect the Universal Declaration of Human Rights. We use our internal project management systems to record against all our business partners and suppliers any perceived or proven breach of the Global Compact principles pertaining to Human Rights.

As a company working with major International Development Donors with their own codes of conduct on human rights we are heavily influenced and look to stay abreast of the policies of our clients. Working in International Development, with major international donors every aspect of our work is ultimately driven by these and over development policies and vetted by our clients in light of them.

As such, Saana's goal is to continue supporting, wherever possible, the Global Compact principles on Human Rights through the work we carry out and ensure that any failure to do so in our power, is recorded and addressed prior to the submission of our next COP.

### Implementation

*Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.*

Saana has recently passed an external audit of our responsibilities under an ISO 9001 Standard. As part of this Standard we were audited on maintenance of our annual reviews of company suppliers. As part of reporting requirements for this standard, Saana has an approved suppliers list which is subject to an annual internal audit. Saana is committed to addressing any concerns in regards to the abuse of human rights on the part of our employees, clients and third party suppliers.

In addition Saana has to submit all relevant project costs relating to external suppliers to our clients, many of which are international development donors and require us to report on the suppliers that we use.

### Measurement of outcomes

*Description of how the company monitors and evaluates performance.*

Following an internal audit under our ISO 9001 and one standard Saana staff have received no reports of human right abuses by third party suppliers. We will continue to monitor this for the coming reporting period and update our third party supplier list as and when needed. Our Supplier is hosted on a shared server which allows all members of staff who come into contact with Suppliers to leave comments which are viewed by all other members of staff and reviewed by the Company's Project Management Unit.

## Labour

### Assessment, policy and goals

*Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.*

Saana fully supports the ILO Core Conventions and the UNGC principles on labour standards. As part of our Citation certification Saana has had our human resource policy and contractual processes reviewed in light of UK labour law and adjusted accordingly to ensure that we enshrine best practice in our overall labour policy and treatment of employees. Therefore our contracts and employee handbook clearly affirm individual and collective employee rights as well as employee's responsibilities to co-workers in this regard as well as acknowledging the right of employees to relevant compensation and benefits. We uphold the freedom of association and collective bargaining and would never seek to work for or partner with any organisation which does not fully recognise the elimination of forced labour, child labour and employment discrimination. As many of our clients are International Development Donors and Agencies these principles are also enshrined within their own labour policies. We are not prepared to work with any business partners or suppliers who do not adhere to the Global Compact Labour principles.

As a business with a global portfolio of projects it is not possible to assess the labour related risks in all the countries in which we work. However, our work comes from winning bids for international development consultancy, in which the funding that we receive to support beneficiaries is issued as part of high level programmes vetted under the international development policies of organisations such as the UK Department for International Development and the European Union.

Saana's core goals are to ensure that our human resources policies and documentation outlining the rights of employees are never in breach of ILO conventions and UNGC principles on labour standards, and to continue updating and reviewing our policies and documentation in light of these.

### Implementation

*Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.*

As outlined in last year's COP our Citation approved staff handbook outlines clear policies and procedures in relation to discrimination and harassment. Our written Code of Conduct regulates our policies and is compliant with Citation Human Resources policy recommendations. All our employees are issued with this staff handbook which provides clear instructions on seeking redress in the case where they feel that their rights under local labour laws have not been respected. Saana also has separate Citation endorsed policies in relation to relevant labour risks and a set of a health & safety regulations to protect staff within the workplace.

As part of our Citation software we undergo a yearly review to ensure that our policies are compliant with relevant labour and employment laws and make any necessary adjustments to our human resource policy as required, including contracting documents and employee guidance contained in our Employee handbook.

### Measurement of outcomes

*Description of how the company monitors and evaluates performance.*

As part of our Human Resource policy contained within our staff handbook, we have in place a clear policy with relevant instructions that encourage employees, clients and partners to report back if they suspect any wrongful doing in regards to our Code of Conduct in the areas of discrimination and harassment. No reports have been filed since the system has been implemented.

We will shortly have our Labour and Human Rights policies audited as part of our Citation certification, to ensure they are in line with national law and international best practice.

## Environment

### Assessment, policy and goals

*Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.*

Saana supports the UNGC principles on the Environment. We are committed to ensuring minimal waste in relation to use of resources. Saana has a clear policy on ensuring that all actions, within the sphere of control of employees, are taken to minimise any adverse effect on the environment.

As a company with a global project portfolio Saana staff and associates have to carry out a large amount of air travel. However, our flights are mostly booked through a single travel agency supplier with whom we are working on getting management information to help measure our environmental footprint over the course of a year. Saana staff are also encouraged wherever possible to combine journeys in order to reduce the distances of travel. We look to encourage all our partners and suppliers to adhere to the Global Compact environmental principles.

Our specific goals in the area of environmental protection this year are to measure areas where we can improve our environmental footprint globally as well as continue the drive within the central Saana office on efficient use of resources and recycling.

### Implementation

*Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.*

The Project Management Unit at Saana which oversees logistics spend has raised awareness all employees of the importance of reducing the carbon footprint of the company where possible. Further environmental protection training is anticipated. We have also asked suppliers to help us address these concerns.

Saana is able to control the temperature of the office through the use of a central thermostat. We regularly check our boiler to ensure it is running efficiently and using the lowest amount of gas supply possible. We are able to monitor this through our monthly and quarterly bills. Saana's Citation approved staff handbook, distributed to all staff, outlines a procedure issued in regards to the actions staff must take (where in their power) in support of Saana's environmental policy in terms of reducing waste materials and consumption of resources. Actions points issued to employees are:

- Turning off lights when not required.
- Turning down heating levels.
- Planning journeys to minimise the fuel used on Company business

- Co-operating with any recycling systems for waste paper etc. that are introduced.

### Measurement of outcomes

Description of how the company monitors and evaluates environmental performance.

Saana provides staff with facilities for recycling of paper, glass and other such recyclable materials. Saana management monitors the use of these facilities and is able to report that staff has increased the amount of recyclable materials disposed of through these facilities.

We have begun the process of getting our suppliers, particularly travel, to help us measure how we might reduce our environmental footprint and impact. Senior Management reviews spend on energy and waste paper resources as part of management reports.

The managing agents of our office are looking into helping us with an external audit of our environmental practices.

## Anti-Corruption

### Assessment, policy and goals

*Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.*

Saana supports the UNGC principles on anti-corruption and the UN Convention Against Corruption. We have a zero-tolerance for corruption in all its forms, including extortion and bribery.

Saana has a specific policy for guiding employees in the case that they are confronted with extortion or bribery. We will not work with suppliers who we feel do not adhere to the Global Compact anti-corruption principles.

Our goals in these areas are to continue to monitor any attempts to coerce staff members into any form of extortion or bribery and maintain our strict policy in this regard from Senior Management downwards. As Saana has a global portfolio and is a small business it is difficult to measure the impact of corruption within the countries in which we operate, however any incidence of corruption emerging from our day to day research is taken into account and staff awareness of such issues is raised accordingly.

### Implementation

*Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.*

As part of our Citation endorsed staff handbook, we have outlined a clear set of policies and procedures around anti-bribery. These policies outline a clear policy on what constitutes bribery. This is in addition to the Anti-corruption and bribery policy in our former handbook which has been circulated to all employees.

Saana highly values its reputation for ethical behaviour and for financial probity and reliability which is also considered a vital necessity by its clients. In 2012, Saana has set out a consolidated course of actions designed to limit its exposure to bribery by:

- setting out a clear anti-bribery policy,
- establishing and implementing anti-bribery procedures as appropriate,
- communicating this policy and any relevant procedures to employees and to others who will perform services for the Company,
- undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings,
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

## Measurement of outcomes

*Description of how the company monitors and evaluates anti-corruption performance.*

Within Saana, the prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery is immediately reported in confidence to the Managing Director. Such incidents are recorded as 'Nonconformances' as part of our ISO Standard, reviewed by internal audit and subsequently at Senior Management meetings, before being audited externally as part of the renewal process of our Standard. No incidents have been reported since the policy has been out in place, but were such incidents reported our ISO procedures ensure that a process of Corrective and preventative action takes place which is also internally audited and reviewed by Senior Management.

Any Supplier, Client or Beneficiary found to be in breach of our Anti-corruption and Bribery policy would be immediately blacklisted on our shared project management system.