

MAKING COMPLIANCE SIMPLER



UN Global Compact

COMMUNICATION ON PROGRESS 2015

Executive statement of continued support for the Global Compact from GAN founder Jens Berthelsen

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



About GAN Integrity Solutions

GAN Integrity Solutions (GAN) 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 professional services within the area of anti-corruption, anti-fraud, sustainability, and business development.

Our aim is to help corporations lower global corruption by increasing the anti-bribery efforts for themselves and their close stakeholders. Based on our unique combination of global compliance expertise, unrivalled methodologies and network of governmental and corporate partners, 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. The Global Compact (UNGC) Principles are central to what we do, with the focus of our work laying 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. The BACP is intended to help companies avoid bribery and extortion by providing them with necessary information and anti-corruption instruments, free of charge. In addition, we deliver e-learning courses for specific industries and professions and for both private and public sector clients in a variety of countries. Companies use the 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 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.



Human Rights Principles

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.

GAN 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.

Assessment, Policy and Goals

Implementation

GAN 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.

GAN 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.

Outcomes





Labour Principles

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.

All GAN 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, cultural or gender identity. Our company is a strong mix of different nationalities, cultures, backgrounds and skills, which allows us to reflect the diversity of the clients we work with, helps us build a solid relationship with our clients and gives us a competitive advantage.

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.

Assessment, Policy and Goals

Implementation

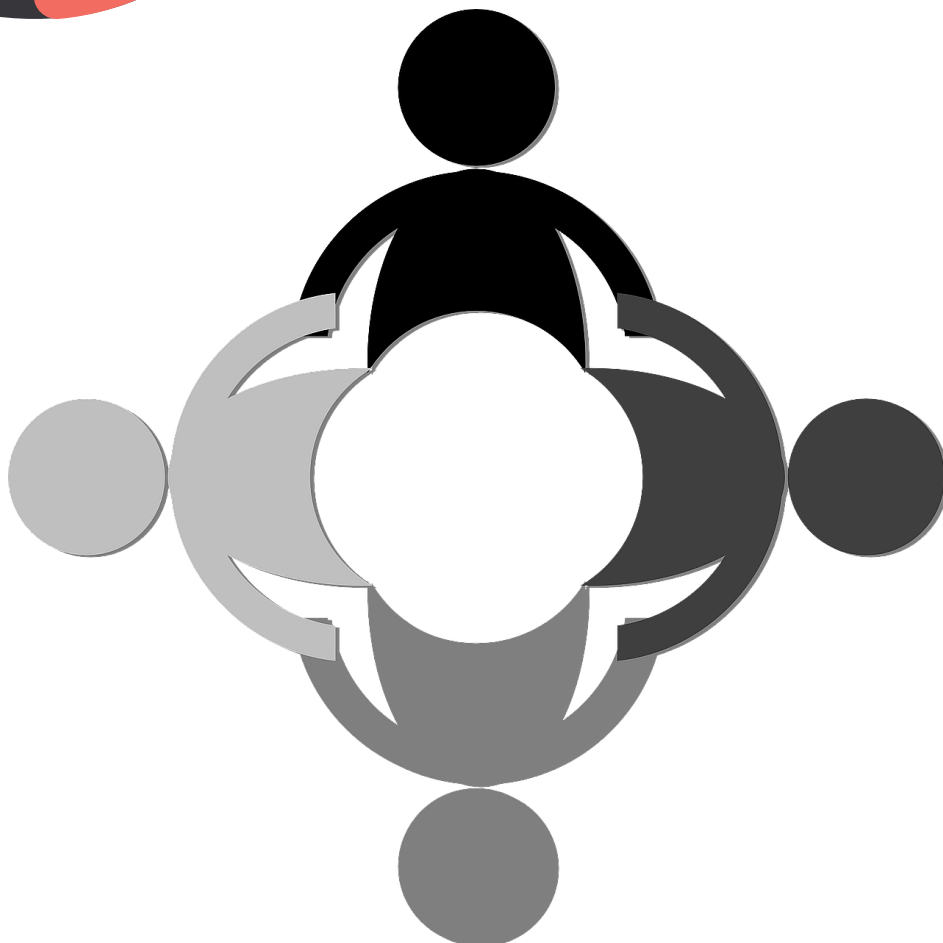
GAN is committed to equality and diversity and prohibits any discrimination and harassment in all forms starting with our recruitment processes and throughout all the working processes and at the workplace. Executive decisions about recruitment, salary, bonuses and promotions are exclusively based on the individual performance of the candidates and employees, with all criteria for promotion being transparent. 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. Weekly and monthly employee meetings are held to update all the members of different departments on current tasks and present an opportunity for them to voice their ideas, concerns, and suggestions for the development of the projects and have an influence on their tasks.

Outcomes

GAN 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.



of GAN's employees are of foreign origin





Environment Principles

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.

As a consultancy and professional services firm, GAN has a relatively low environmental impact. 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 company 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 services.

Assessment, Policy and Goals

GAN takes environmental issues into consideration in its business operations whenever possible. We constantly seek to influence our employees towards environmentally friendly policies and practices inside and outside the office, from applying a video and phone conference technology to separation of waste and recycling materials.

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.

Implementation

In 2014, GAN has not increased the level of its CO2 emissions and still shows very low impact on the environment as a footprint of its business operations. We have been dedicated to reducing the amount of food waste. Despite the increase in the amount of employees in our company, our contribution to climate environmental issues connected to food waste has been minimal in the past year.

Outcomes





Anti-corruption Principle

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's consultancy work with businesses and institutions, in their endeavours to implement and live up to their ethical principles. We actively support the UNCAC 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 is produced by GAN and supported by the European Commission and six EU member states. The portal helps companies develop and maintain transparency in their external and internal business activities, especially when operating in unfamiliar foreign 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 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

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GAN 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 the anti-corruption principle of the Global Compact, when carrying all our business activities.

During the past year, GAN 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 2015, 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.

Outcomes



“ GAN supports leading companies and organisations in their efforts to achieve higher levels of corporate sustainability performance and implement the 10th Principle of the UN Global Compact. ”



The UK Bribery Act cites the BACP as the only tool for anti-corruption risk assessment in its **UK Bribery Act 2010 Quick Start Guide**.

CONTRIBUTING TO A SUSTAINABLE BUSINESS ENVIRONMENT & GLOBAL FIGHT AGAINST CORRUPTION



GAN 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 business operations. We believe that anti-bribery efforts can positively contribute to lowering global corruption and enhance 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 aimed at educating top business leaders on how to avoid bribery and ensure consistency throughout their organizations.

We are committed to supporting international and regional legal frameworks. In 2014, GAN introduced the Compliance Guides on the BACP to help companies comply with harsh demands of global anti-corruption legislation.

GAN is committed to carrying out pro bono work each year to ensure global business environment free of fraud. The highlight of our pro bono work in 2014 has been the anti-corruption consulting and training delivered to the Maritime Anti-Corruption Network (MACN). The MACN stands for global collective action against corruption in the private sector comprised by the leading vessel owning companies in the world. We have shown support for the MACN, thereby taking responsibility for supporting the Global Compact Principles.



In cooperation with the European Commission, the information about corruption risks on the BACP has been expanded by 33 new country profiles in 2014 reaching over 100 country profiles available in different languages. The BACP has been increasingly visible and active on Social Media enhancing its potential global outreach. 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.

