

**SALAMA FIKIRA GROUP LIMITED**  
**Communication on Progress**

**2015**

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To our Stakeholders,

**Salama Fikira**

**Communication on Progress on Implementation of the 10 Principles of the UN Global Compact**

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

This is our second annual Communication on Progress. In this report, 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,

**Conrad Thorpe OBE**  
CEO  
Salama Fikira



## INTRODUCTION

The Salama Fikira Group's operational objective is the provision of risk management and logistic services across Africa, with particular focus on sub-Saharan Africa. We strive to make the Global Compact Ten Principles part of our business strategies and day-to-day operations.

It is our pleasure to present our second Communication on Progress for the period of June 10, 2014 to June 10, 2015. With this document, we aim to make a public disclosure to our stakeholders on the progress Salama Fikira has made over the past year in implementing the ten principles of the UN Global Compact with respect to Human Rights, Labour, Environment and Anti-Corruption, and in supporting broader UN development goals.



## 1. HUMAN RIGHTS PRINCIPLES

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses

### Assessment, Policy and Goals

Salama Fikira Group Limited (SFGL) continues to root human rights into the company's operations and culture through compliance with both local and international laws. SFGL strives to ensure that its business activities, and those of its partners and suppliers, are consistent with these principles so as to avoid infringement of the universal human rights.

SFGL keenly abides by the Kenyan Constitution that was promulgated in 2010, which hugely endorses human rights and equality. In addition to that, the company is a signatory to the International Code of Conduct (ICOC) for Private Security Service Providers, hence affirming its respect to human rights and the humanitarian law.

SFGL also embraces the Voluntary Principles on Security and Human Rights (VPSHR), designed for companies in the extractive industries. In addition, it has a comprehensive Standard Operating Procedures and Rules for the Use of Force that adhere to universal human rights. The company's employee handbook continues to emphasize on fair treatment of employees and details the reporting procedure for unfair treatment.

### Implementation

Human Rights training remains a part of the German Flag State Country regulations training for maritime operations in the company.

SFGL continues to implement human rights in its policies, including Bullying and Anti-Harassment Policy, Compassionate Leave Policy, Non Discrimination, Equal Opportunity Policy and Grievance and Conflict Resolution Policy.

### Measurement of outcomes

The company has had an experience on VPSHR risk assessment as part of a security training course which the company carried out on the staff of a client company. It has also been subjected to audits in respect of VPSHR risk assessment from oil and gas operators who it supports, both onshore and offshore.

To date, SFGL has not been subject to any investigation or legal cases with regards to Human Right violations.



## LABOUR PRINCIPLES

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

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation:

### Assessment, Policy and Goals

SFGL's employee handbook clearly states the minimum employment age, employee remuneration, grievance and conflict resolution, right to join trade unions, and intolerance of any form of discrimination or harassment.

SFGL supports the International Labour Organisation (ILO) core conventions and complies with local labour regulations.

### Implementation

SFGL's continues commitment to its Local Content policy that is created to provide employment and economic development opportunities to local citizens as well as local industries.

SFGL introduced a supplier evaluation procedure that seeks to ensure that the company's partners and suppliers adhere to the same standards of labour practices as does the company. This is done through an annual supplier audit and an evaluation checklist on all new and existing entities within the company's supply chain.

SFGL keenly implements the no discrimination policy and strict measures are put in place to ensure fair treatment of all its employees.

### Measurement of outcomes

SFGL's local content has improved from 70% in 2014 to 76.9%. The company continues to conduct internal audits to identify gaps and near misses so as to ensure total compliance of the policies and procedures.

SFGL is pleased to have obtained the ISO 18001 certification on Occupational Health and Safety Management systems in December 2014. In addition to this, it has improved its Health and Safety policy over the year to enhance the recording and reporting of health and safety incidents and near misses, as well as identifying gaps in policy adherence.

To date, SFGL has not been subjected to any legal cases or statutory notices in regards to violation of principles.



## ENVIRONMENTAL PRINCIPLES

Principle 7: Businesses should support a precautionary approach to environmental challenges;  
Principle 8: undertake initiatives to promote greater environmental responsibility; and  
Principle 9: encourage the development and diffusion of environmentally friendly technologies

### Assessment, Policy and Goals

SFGL is keen on environmental conservation and sustainability and hence undertakes operations that have minimal impact on the environment. This includes putting guidelines in place to ensure proper waste management activities, recycling, and protection of natural resources and reduction of water, air and land pollution.

### Implementation

SFGL continues to incorporate internal mechanisms that ensure environmental sustainability and promotion of environmental conscious behaviour among its employees. These measures include:

- Emphasis on SFGL being a paperless company hence reducing the use of paper and saving documents in digital forms.
- Cessation of the use of 500ml water bottles for office consumption and instead using reusable dispenser bottles
- Incorporating environmental responsibility in its Corporate Social Performance such as supporting the Tsavo Trust project which works to secure the country's wildlife and the Rhino Ark Conservation charity that raises funds to protect Kenya's most critical mountain forests.
- Encouraging environmental stewardship among its employees in their behaviour such as minimal use of air conditioners, keeping the lights off unless absolutely necessary, double sided printing when printing is unavoidable, minimal use of colour printing, use of reusable kitchenware, reduction of fuel consumption on company vehicles, recycling and proper disposal of waste.
- Undertaking Dynamic Risk Assessments on each tasks to capture any environmental risks that may be present.

SFGL plans to attain the ISO 14001 certification on Environmental Management System within the fourth quarter of the year, so as to fully comply with the international law and regulation on environmental sustainability.

### Measurement of outcomes

There is a great reduction on operational costs over the last year due to the measures implemented to conserve the environment, such as reduction of fuel costs, electricity and water bills.

SFGL has not had any environmental incident last year and has not been subject to statutory notices or prosecutions.



## ANTI-CORRUPTION PRINCIPLES

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

### Assessment, Policy and Goals

SFGL upholds to maintain its good reputation through lawful, honest and transparent practices. The company is aligned to follow the following principles: Kenya Anti-Corruption and Economic Crimes Act, U.S Foreign Corrupt Practices Act, OAS Anti-corruption Convention, OECD Convention on Anti-Bribery, World Bank Anti-corruption standards, U.K. Anti-bribery Law Enhanced and the U.N. Convention on Corruption.

In addition to this, SFGL has a Code of Business Conduct, Anti-bribery and Corruption that sets out its expectations on the conduct of all its employees, consultants, suppliers, contractors, agents and partners. This code is updated annually to ensure compliance.

### Implementation

SFGL continues to undertake Anti-corruption and Bribery training on its employees and consultants through meetings, briefings and distribution of company policy documents on the subject.

SFGL ensures that its suppliers uphold the same notion on anti-corruption and bribery. The company has implemented a supplier evaluation procedure over the year to assess their Anti-corruption and Bribery (ABC) policies. The company requires its subcontractors to contractually abide by SFGL's ABC Policy.

SFGL continues to hold CARP (Corrective Action Report Process) meetings to discuss and review near misses and non-conformities, including bribery and corruption cases as they may be. The frequency of these meetings has been increased from monthly to every fortnight.

### Measurement of outcomes

During the past year, SFGL underwent an intensive Anti-corruption and Bribery due diligence by TRACE International, successfully completed the process and was awarded the TRACE certification as a TRACE Certified Agent. Among the benefits being enjoyed include access to online training modules on anti-bribery compliance and human trafficking awareness as well as free participation in TRACE workshops.

SFGL implemented a supplier questionnaire that is sent to all our suppliers on an annual basis to evaluate their performance and adherence to anti-corruption and bribery policies.

SFGL has not undergone any investigations, legal cases, rulings or any incidents on corruption or bribery.