



16.11.15

To Our Stakeholders,

Northcott Global Solutions (NGS) is still supporting the Ten Principles of the United Nation's Global Compact covering the four main areas as follows: Human Rights, Labour, Environment and Anti-Corruption. Our Communication on Progress highlights the steps that have been taken by NGS staff to align their everyday actions with the Ten Principles.

NGS is constantly reviewing and monitoring progress on all of the Ten Principles of the UNGC. Our company policies on Human Rights, Labour, Environment and Anti-Corruption and moreover our constant monitoring of NGS actions against the aims of these policies ensures our aims and objectives are kept realistic and achievable whilst ensuring that NGS reaches the highest possible standards.

NGS takes full accountability of operating in a responsible manner that supports high environmental and social standards worldwide. Moreover, NGS is committed to constantly review and develop practices to positively contribute towards general wellbeing in all aspects of the world that we live in. NGS as a company recognises that this is an on-going process where there is continually room for improvement.

NGS commits to sharing this information to all stakeholders using our primary channels of communication and furthermore welcomes any feedback that others wish to provide.

Sincerely Yours,

Ted Jones, CEO



## Northcott Global Solutions – UN Global Compact

### Communication on Progress

The Ten Principles of the United Nations Global Compact *from the Global Corporate Sustainability Report 2014*

#### HUMAN RIGHTS

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.

#### LABOUR

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.

#### ENVIRONMENT

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.

#### ANTI -CORRUPTION

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

## Human Rights

NGS addresses both principles 1 and 2 by:

NGS also has a multitude of company policies compliant within the Human Rights continuum:

- 1) Human Rights
- 2) Grievance Policy
- 3) Harassment Policy
- 4) Trauma Risk Management (TRiM) Policy. This is something we feel holds great importance considering the previous occupations of the majority of NGS staff (ex-military)

Please see an extract below of Human Rights Policy:

### Implementation of Policy

*NGS obtains its easy-to-read summary of the Universal Declaration of Human Rights readily available for all to read (highlighted in the NGS Handbook) at the end of this document. This handbook is revised and distributed among staff, at least twice a year to actively highlight all NGS policies/codes of conduct.*

*NGS makes sure it provides a number of options with respect to making it easy for people to report any human rights violation that arises. This documentation is highlighted in the handbook (biannually distributed and updated), which is available to all staff. Please see green box at end of this document for guidance on how to officially register a Human Rights associated matter.*

### Outcome of Human Rights Abuse Claim

*Investigations will occur and if appropriate, legal action will follow. If legal action does not follow, disciplinary procedures will be invoked. NGS is to keep investigating and hold meetings between the person who reported it, the victim of human rights violation (if different from the reporter), Ted Jones (CEO) and the victims representative of choice (should they wish to have another person there). These meetings will be held weekly and then at a reduced frequency until all parties are happy that not only the issue has been resolved but appropriate measures have been taken to prevent it from happening again.*

*Any instances of deliberate Human Rights violation will be likely to lead to instant dismissal.*

*NGS will internally audit itself every time this process happens to reflect on the effectiveness of the process and improvements are suggested and implemented for the future. Lizzie Johns is responsible for heading the internal audit and identifying how the process will be improved for the future. Should no human rights violations occur in the year- the process shall, like all other policies be updated and improved on, at least on an annual basis. Lizzie Johns will head this process. She will present any changes to the system clearly to higher management and colleagues alike.*

NGS takes Human Rights seriously and is actively committed to promoting Human Rights Standards to its entire staff-force, stakeholders and throughout it's supply chain. NGS

respects the International Human Rights Standards in its Global Operations and furthermore avoids complicity in all Human Rights abuses. NGS recognises the “Protect, Respect and Remedy” set forth by the Special Representative of the Secretary-General on the issue of Human Rights and transnational corporations and other business enterprises. NGS meanwhile will adhere to National Laws and seek to ensure respect for fundamental Human Rights. NGS supports the principles, and self-audits using the Universal Declaration of Human Rights and the International Covenant on Political, Social and Cultural Rights.

NGS supports the principles outlined in the Universal Declaration of Human Rights. NGS has a statement summarising the Universal Declaration of Human Rights available for all to see on the server.

NGS has a system for reporting Human Rights Violations as clearly defined in the Human Rights Policy and in the employee handbook. Any violations are recorded and monitored by the appointed individual at NGS. The reporting, investigating and dealing with each violation is a clear process as defined in the relevant NGS policies. This system is analysed each and every time there is a violation as NGS recognises the importance of continually monitoring and improving these internal systems. Should there be no violation / complaint, NGS, at a minimum, will review our internal systems.

## Labour

NGS addresses principles 3, 4, 5 and 6 by:

NGS recognises that our staff are the most important asset to the company. Protecting the interests of the staff and maintaining a peaceful, happy environment is at the heart of the company's ethos. NGS does not force labour. NGS recognises right of collective bargaining and upholds Freedom of Association.

NGS have the following policies associated with Labour:

- 1) Equal Opportunity Policy
- 2) Human Rights
- 3) Health & Safety Policy
- 4) Suppliers Code of Conduct

These policies clearly highlight the fact that NGS promotes the equality of opportunities, afforded to each employee / potential employee of the company. This is irrespective of matters such as one's sex, race, disability, sexual orientation, religion, beliefs or age (their “protected characteristics”).

The following quotation is taken from NGS's Equal Opportunities Policy:

*The company will treat any reports or instances of such discrimination with the utmost seriousness and will investigate fully and invoke the disciplinary procedure if there are grounds to believe that any such conduct is discovered. Any instances of deliberate discriminatory conduct will be likely to lead to instant dismissal.*

*To comply with its legal obligations, the company may collect data to monitor the effectiveness of this policy and to prevent instances of discrimination from occurring.*

NGS has established procedures in place to monitor and evaluate the extent to which the policies are being followed. Any breach in policy is recorded and investigated and escalated to the appropriate line-manager, where upon the appropriate action will be taken. NGS keeps statistics on the number and severity of issues / grievances with regards to all its policies. This is extant across the whole of NGS and also extends to our service providers through NGS Service Provider's Code of Conduct. This outlines the standards to which we want them to adhere. NGS believes that this particularly important due to the areas of the world in which our service providers operate; such remote regions of the world are often characterised by Child Labour and other such associated criminalities. NGS therefore ensures that it is not collaborating with any organisation that supports Child Labour.

Since Richard Magnus's meeting with our solicitors, NGS followed the recommendations put to us on how to make the work place more accessible to disabled staff. Now NGS actively recruits injured and disabled ex-military personnel from organisations such as the "Poppy Factory". Experts in their field, these staff work in our Operations Room replicating what they have done throughout their military career into the civilian/ private sphere.

NGS has newly established an eLearning platform in which all staff are trained. eLearning is directed towards safety and acts as a guide to what should be done in particular circumstances. All staff have completed the eLearning guide and test as part of NGS policies. Certificates are kept with record of result on server. eLearning will be now be taken on an annual basis, and record of improvement will be stored.

NGS reviews all policies and internal systems associated with this section annually at a minimum. NGS staff have at minimum one appraisal with the CEO Ted Jones per annum to discuss Remuneration and any other relevant issues. NGS recognize the importance of being pro-active in this department.

## Environment

NGS addresses principles 7, 8, and 9 by:

Northcott Global Solutions Ltd is committed to meet environmental best practices, for our own employees, for our clients and for our providers consistent with and appropriate to our business processes worldwide. NGS supports the use of environmentally technologies.

NGS has a number of environmental policies all available on request:

- 1) Energy & Water use policy
- 2) Environmental Policy & Environmental Management system (EMS)
- 3) Sustainable Waste Policy
- 4) Waste Management policy
- 5) Sustainable paper policy



PLAN

Create a process improvement plan.



DO

Execute a process improvement plan.



CHECK

Inspect feedback and adjust plan



ACT

Integrate a process improvement plan

These policies all clearly define NGS's ethos towards the environment and the importance of protecting the world in which we live. The EMS allows NGS to quantify our environmental impact. This in turn allows us to record and monitor our impact as we grow as a company and therefore it will be noticed when we use. This policy NGS utilises the Planà Do à Check à Feedback Cycle that helps to guarantee that the Environmental Management System works effectively and ensures that the process is a continuous commitment that does not end with implementation, this cycle also helps to promote greater environmental responsibility.

### Anti-Corruption

NGS addresses principle 10:

NGS is a signatory to and moreover adheres to the laws and regulations associated with the 2010 Bribery Act. NGS has a PowerPoint presentation that all staff receives once newly employed at NGS. A register is taken to ensure the staff receive the presentation at least once a year to update them on any changes / modifications to laws and internal systems.

#### NGS Related Policies:

- NGS Anti-Corruption Policy
- Supplier Code of Conduct
- Password Protection Policy
- Data Protection Policy
- Data Classification Policy

As a global company, Northcott Global Solutions Ltd is dedicated to ensure full compliance with all anti-bribery and corruption laws and regulations by all it's employees and agents. Northcott Global Solutions Ltd has a no tolerance policy towards bribery, extortion and corruption. This policy extends to all the company's business dealings and transactions in all countries in which it, or its associates operate. This policy is given force in a detailed company anti – bribery program, which is constantly revised to capture changes in law, reputational demands and changes in the business. All employees are required to comply with this policy.

NGS is in full support of the UN Convention against Corruption & strictly follows the criteria below:

- Prohibited from offering, promising or paying a bribe of any kind
- Prohibited from soliciting, accepting or receiving a bribe of any kind



- Prohibited from giving or offering anything of value to a public official
- Required to comply with company's guidelines in giving and receiving hospitality
- Prohibited from making facilitation payments
- Required to complete due diligence on all agents, representatives, suppliers, contractors, joint venture partners and all those with whom a business relationship is established

Considering the regions of the world in which NGS operates, NGS has strong and active anti-bribery / corruption procedures in place. NGS is committed to maintaining the highest ethical standards and enforces this wherever it operates in the world. The Company will not engage in bribery, extortion or corruption.

NGS has a clear company policy on gifts and hospitality. Moreover NGS records all activities and transactions accurately, completely and transparently. NGS believes it is important that we not only abide by these Anti-Corruption Standards but the companies that we deal with also do: NGS has obligatory Due Diligence Questionnaires for all Service Providers, a Service Provider Agreement to contractually bind these companies to abide by NGS anti-Corruption standards, a Supplier Code of Conduct (outlining what we expect from our service providers).



All NGS policies are reviewed annually at a minimum. This ensures any deviations from the Aims and Objectives of our policies are identified and corrected for inline with our management systems.

**NGS**  
NORTHCOTT GLOBAL SOLUTIONS