



SANTA FE  
RELOCATION SERVICES

# COMMUNICATION ON PROGRESS



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## 01

## STATEMENT FROM THE CEO

2015 was an eventful year for Santa Fe. We re-branded our company to Santa Fe – so we are now Santa Fe all over the globe. At the Annual General Meeting it was approved to change the name of the listed Parent company (formerly the East Asiatic Company Ltd. A/S) to Santa Fe Group A/S (SFG).



**Martin Thaysen**  
Chief Executive Officer

We established a new Group Leadership Team (GLT) to get a better balance between regional/ local priorities and global strategy. The team now consists of the Regional CEOs, COO, the Group Functional Managers and the Business Line Directors for Relocation Assignment Management (RAMS) and Immigration Management Services (IMMS).

We implemented Microsoft Office 365, and are now all on one mail system across the globe, with integrated calendars, Skype and social networking. We implemented Pulse – our new HR system. And we took the first steps to completely change our technology platform over the next 3 years.

We also launched our first ever global engagement survey with Great Place to Work. Excellent participation and some important feedback on where we are strong, and where we can still improve and develop.

A recurring event throughout the year was the very positive feedback that we received from our customers and from assignees that had a great experience relocating with Santa Fe. Of course, not all is easy and not all works completely smoothly when we relocate some 75,000 families across the globe – but the overall feedback we received was very, very positive, and there were countless examples of customers and assignees proactively reaching out to tell us.

We are delighted to present our sixth Communication on Progress Report in support of our continued commitment to the 10 UNGC principles. The UNGC principles will continue to act as a guide, an inspiration and an aspiration to help create a sustainable future. Santa Fe will continue to drive forward its commitment to the UNGC guided by our own long-standing values of trust, honesty and integrity.

# 02

## ABOUT SANTA FE

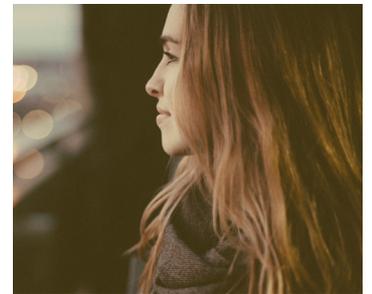
Santa Fe is a global mobility company specialising in managing and delivering high-quality relocation services worldwide. Our core competence is our ability to provide these services to a consistent high standard, locally and globally. A key aspect of this is being able to manage our service delivery through our own offices.

Our 2,908 dedicated professionals speak more than 100 languages and deliver approximately 60,000 international and 15,000 domestic relocations annually through our representation in 44 countries across six continents. As a business handling relocations anywhere in the world, our cultural diversity, local presence and depth of experience means that there is no other relocation company that can support our clients to the same level.

Santa Fe operates so our clients and their assignees experience consistency, a single point of contact and high levels of support. Santa Fe's customer centric approach ensures that we are expanding in accordance with the needs of our clients. In the past several years, we have continued to expand our geographical presence with new self-owned offices in Qatar, United States, Brazil, Mongolia, Myanmar and New Zealand, all to support our clients' requests for local expertise in these locations.

Demand for mobility services from global corporations is undergoing structural changes with added impetus on costs saving. Santa Fe continually develops new services that are relevant in the current business climate and assists its customers to achieve cost-reductions in the management of their mobility programmes.

Santa Fe Group is headquartered in Copenhagen, Denmark with daily management of Santa Fe Relocation Services in London, United Kingdom and regional hubs in key global locations. Our core competence is our ability to provide services to a consistent, unifying high standard, locally and globally. A key aspect of this is our own offices, delivering services in critical locations that multinationals find most challenging. These services are delivered via World Link, our global network, consisting of own offices and Approved Partners.



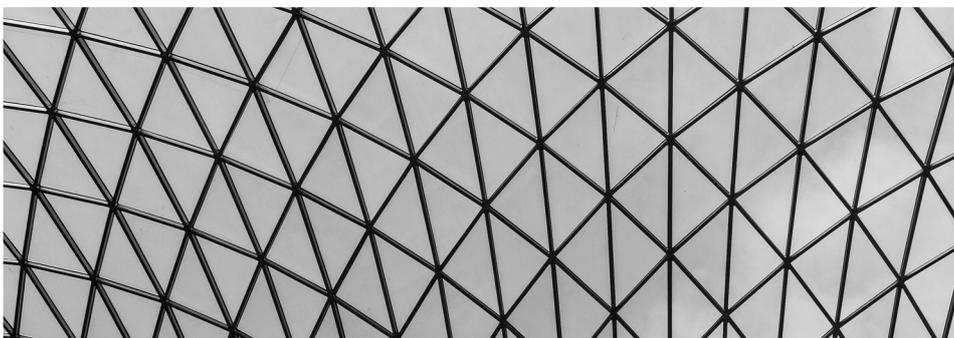
# 03

## GOVERNANCE PROCESS

Santa Fe Group's governing structure ensures that we are directed and controlled in a responsible manner, to ensure long-term sustainability and transparency.

We transparently report our performance annually in terms of financial results, social responsibility and the operational aspects of our business.

Our objective is to ensure our business remains sustainable in every meaning of the word. This means that we are able to provide our customers with a service that both offers value and continuity. It also means that through our continued commitment to aligning our operations and strategies with the ten UNGC principles, our Company contributes and benefits economies and societies globally. The governance structure has been strengthened with a sustainability team aiming at aligning sustainability objectives, implementing and sharing best practices. The team consists of members in each region with overall responsibility held by the Santa Fe Group CFO.



# 04

## TEN UNGC PRINCIPLES

The CSR policy of Santa Fe is based on the 10 UN Global Compact principles (UNGC) along with compliance with international and national laws. Where international minimum standards for CSR are higher than those required by national law, Santa Fe strives to uphold international standards. In addition, Santa Fe goes beyond legal compliance in a number of areas where the company can contribute to sustainable development by applying its core competences.

### 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.

#### We commit to:

- Continuous monitoring of our governance system to ensure compliance with basic human rights within our organisation and those with whom we interact
- Compliance with national legislation

### 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.

#### We commit to:

- Reduce the negative impact of our business on the environment, meet or exceed regulatory requirements and continuously seek to improve our processes to achieve high standards.
- Monitor and Reduce carbon emissions.
- Reuse 100 % of packing material where quality is not compromised.

### Anti-Corruption

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

#### We commit to:

- Apply a zero tolerance approach with respect to corruption, extortion and bribery.
- Continuously identify ways of maximising the positive impact of our business operations where we have special skills, products or services to make a difference in the communities where we live and work.



# 05

## CORPORATE SOCIAL RESPONSIBILITY

Corporate social responsibility (CSR) is an important part of the culture at Santa Fe, and it's an embedded component of our business ethics. It's about us being accountable for our impact on our society and our environment and it's integral to all our relationships- with employees, clients, suppliers, partners and communities worldwide.

We take our corporate social responsibilities (CSR) seriously; we know that we can always do more. We're constantly looking at new or different ways to make sure that our people are proactive global citizens who have a positive impact on the communities around them.

### Stakeholder Engagement

We recognise the importance of identifying and engaging with our stakeholders. They provide us with a diverse range of perspectives and experiences which inform, develop and refine our CSR programme. In turn, our stakeholders are intimately involved in CSR activities.

### Employees

Through one-to-ones, team meetings, events, engagement surveys, round table discussions, we encourage open dialogue to find out what matters to our people- and learn how they want to make a difference.

### Clients

By listening and learning from the organisations with which we work, we can understand what is important to them and how our CSR strategies align.

### Opinion leaders and industry thinkers

By engaging with leading bodies, such as the UN Global Compact, we can draw upon their existence knowledge and experience.

### Non-profit organisations

By building close and long-term relationships with global non-profit organisations, we can respond to the needs of our local communities, undertake actions to improve the environment and shape the relevancy of our CSR programme.

Suppliers and partners

Working with third-party partners and suppliers, we can implement best practice and influence relationships to ensure stable growth and responsible business practices.

Santa Fe Group's corporate responsibility strategy contains five prioritised areas:

### Ethics and behaviour

Binding guidelines with the aim of ensuring that all employees perform their duties in accordance with our business ethics.

People, Health and safety  
Ensure a healthy working environment for our employees

### Environment

Assume responsibility for reducing our environmental footprint.

### Anti-Corruption

Maintain a zero tolerance approach to corruption in all its forms.

### Supplier standards

Ethical standards that our suppliers must follow, and we will ensure that these standards are, at a minimum, in compliance with the UN Global Compact.



# 06

## ETHICS AND BEHAVIOUR

To truly make a difference in our organisation, CSR must be embedded into our culture, in addition to our processes, policies and practices. It must be aligned to our strategy and we must take a long-term view.

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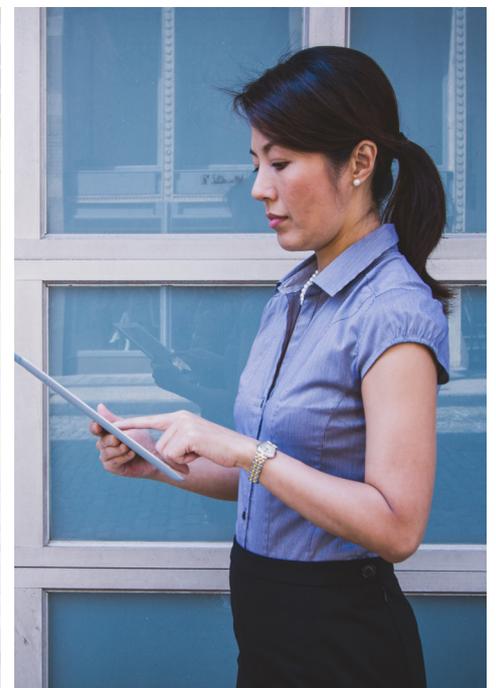
To act in a globally responsible way, we continually review our initiatives, codes and schemes so that we can learn from them. We pride ourselves on a fair, ethical and inclusive approach to our business, our people and our clients.

Our Code of Business Conduct and Code of Business Conduct, Staff Guidebook provides guidance to all employees on the conduct of our business according to the highest ethical standards. We have grown and prospered with a culture of honesty, integrity and accountability.

The Code contributes to our future success by helping to maintain this culture. The Code and our other ethics policies help to focus everyone on areas of ethical risk, offer guidance in recognising and dealing with ethical issues and provide mechanisms to report unethical conduct without fear of retaliation.

We revised the Code of Business Conduct in 2015 which involved placing a stronger emphasis on anti-corruption practices.

In 2016 we plan to revise the Code of Business Conduct, Staff guidebook; strengthening the guidance on data privacy and anti-corruption.



## 07

## PEOPLE, HEALTH &amp; SAFETY

**Investing in our people**

Continuous learning and development is critical to the growth and success of our employees and we ensure that everyone in our organisation has access to development opportunities. We have identified key focus areas to ensure that we are equipping our people with the capabilities they need to achieve their career aspirations and help us meet our goals.

The 'Managing @ Santa Fe' management fundamentals programme is a global learning initiative successfully launched in 2015 with over 125 managers attending the two-day event in five locations across the Santa Fe network. The programme is designed to give line managers more confidence in successfully completing day-to-day managerial activities, including performance management, providing feedback and coaching, understanding team dynamics and Action Centred Leadership as well as motivation and engagement. Further programmes are planned throughout 2016 in an effort to ensure that the majority of line managers – in particular first-time managers and those managers new to the organisation – appreciate the fundamental principles of leading others and getting the best out of their teams.

Enhancing our Learning Platform we offer online learning opportunities to all of our employees. In an era of "information overload," it is vital that we help employees easily access the most relevant, targeted content and courses that will enable them to develop the capabilities they need to succeed. In 2015, we finalised our plan to move our learning management system (LMS) to a single platform within our HR Management System (HRIS) that will enhance individual experience while allowing us to better measure learning outcomes. Our new HRIS—Pulse—was implemented across our entire organisation in 2015. It will allow us to develop capabilities on a global scale in a more integrated fashion, share training content more easily, design curriculum that incorporates multiple modes of learning and provide a more customised experience for individual learners. Overall, the course catalogue will be targeted toward the most current, relevant and in-demand skills and content. For our employees, the learning experience will be a much more personal one.

One of our core people initiatives in 2015 was the implementation of our first ever global employee engagement survey. We are partnering with the Great Place to Work © institute on this strategic people project and are already embracing the feedback from our employees by running local focus groups and getting a better understanding of the working environment we need to create to foster a culture of trust at all levels. 77% of all employees took part in the survey and while there is some work to do, we have a number of markets with outstanding results. Culture change is a marathon, not a sprint, and we know that it will take time. However, we are proud of having started this important engagement initiative and are already looking forward to our October 2016 survey.



## PEOPLE, HEALTH & SAFETY (CONTINUED)

2016 will also be the year in which a globally consistent approach to Performance Management is introduced across Santa Fe. Not only have we introduced consistent metrics for our senior leaders, we are also supporting the roll-out of the process through an online performance management system which ties seamlessly into our existing HRIS and LMS, creating a compelling overall 'online bundle' for our employees. In order to ensure performance management has a positive impact, we will only request the top two levels of the organisation to complete this year's process; from 2017, it will be cascaded further. The process has been designed with constant feedback in mind, e.g. monthly 1-on-1 meetings between managers and employees to update one another on performance against objectives. This will reduce the potential ambiguity and stresses often caused by formal mid-year and year-end review cycles as employees will have received on-going feedback throughout the year.

As a global company, our employees, contractors, clients and suppliers come from diverse backgrounds and cultures. By valuing diversity and equal opportunity, we connect with the richest spectrum of experiences, skills, expertise and perspectives for all of the markets we serve. This philosophy is also reflected in our own recruiting process – we recognise that a diverse workforce fosters creativity, innovation and better business practices.

### Diversity

Santa Fe continues to monitor gender ratio to ensure that we are an attractive employer to both male and female prospective employees as well as our current employees. The overall female gender ratio increased, this was attributed to the increase of female employees at the office staff level.

In accordance with its support to UN Global Compact and in line with its long-running practices, Santa Fe Group endeavours to create equal opportunities for employees and managers, regardless of gender, ethnicity, age, political and religious convictions, etc.

Pursuant to Danish legislation on gender equality, Santa Fe also has an objective for the proportion of the underrepresented gender on the Board of Directors. It is Santa Fe's ambition that 25% of the members of the Board of Directors are women. Consequently Santa Fe will ensure that qualified candidates are considered before the Board of Directors proposes candidates to the Annual General Meeting. However, the Board of Directors' final submission of candidates will always be based on their actual competencies and experiences relative to Santa Fe's needs to ensure that the candidate deemed best qualified is proposed. In 2015, 1 of 4 members (25%) of the Santa Fe Board of Directors was a woman.

Following the transformation of Santa Fe in 2015 with a generational handover in executive management and the launch of a new strategy towards 2020, the Board of Directors also wishes to ensure that the composition of the Board forms the best possible support for the future journey. This may mean that the ambition of a 25% female representation on the Board of Directors will not be met at all times, but it will continue to be a general ambition.

### Employee retention

Retaining employees remains an important aspect of our business, our goal is to remain an attractive employer respecting, supporting and adhering to internationally proclaimed human rights including the basic principles of the International Labour organisation's Declaration of Fundamental Principles and Rights at Work.

Our absolute turnover was 23.3% with higher turnover rates being seen in Australia, mainly due to restructuring of the organisation. Our goal is to bring the absolute turnover to 20%

### Health & Safety

We take appropriate measures to provide a safe working environment for all of our employees, contractors and consultants. We focus on compliance with health and safety legislation within our own business operations and also apply this same standard as a matter of priority. We recognise the importance of work-life balance, and appreciate the value that out-of-work activities bring back into the workplace. We also aim to foster a culture of well-being by providing a variety of tools, education and resources that reinforce healthy lifestyle choices.

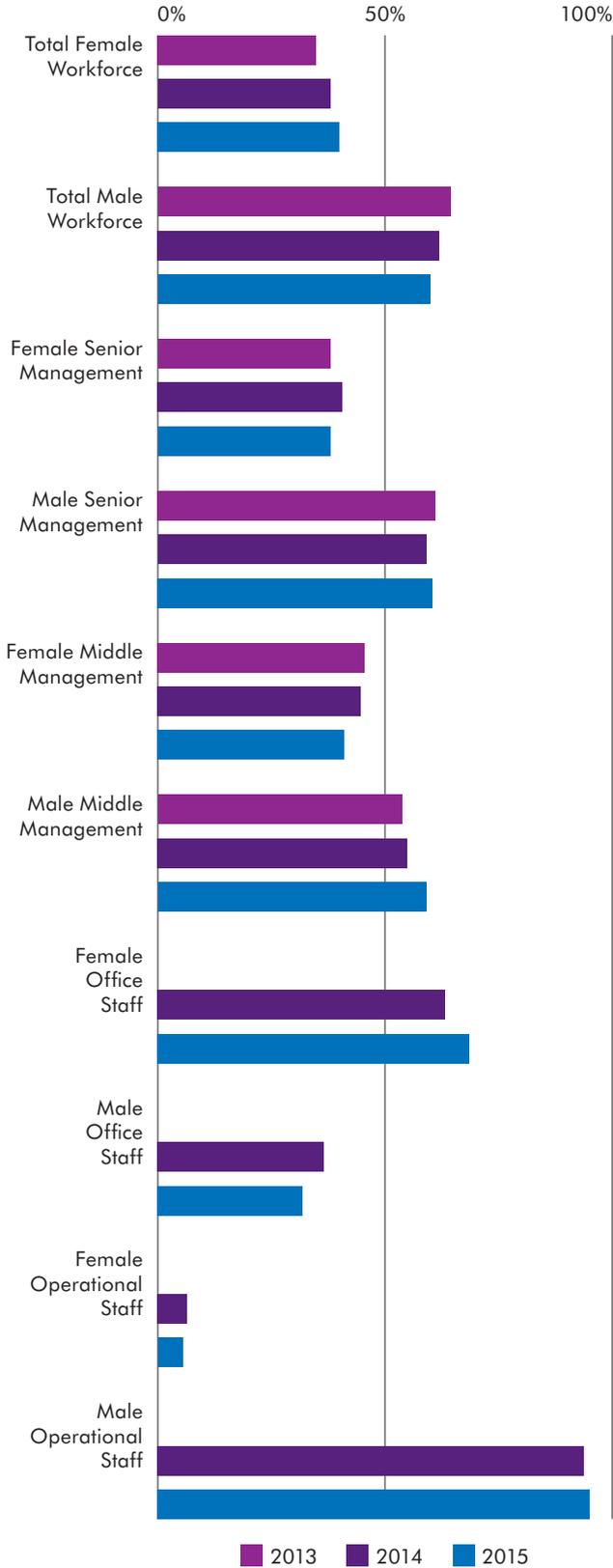
In the field of occupational health and safety, both the number of accidents with time lost and the number of lost workdays per accident increased in 2015. These were mainly due to work accidents involving operational staff undertaking manual labour. We aim to reduce the number of work accidents and associated days lost in 2016 by continuing with the integration of health and safety considerations in decision-making processes, along with more training, cooperation and improved coordination across the organisation.



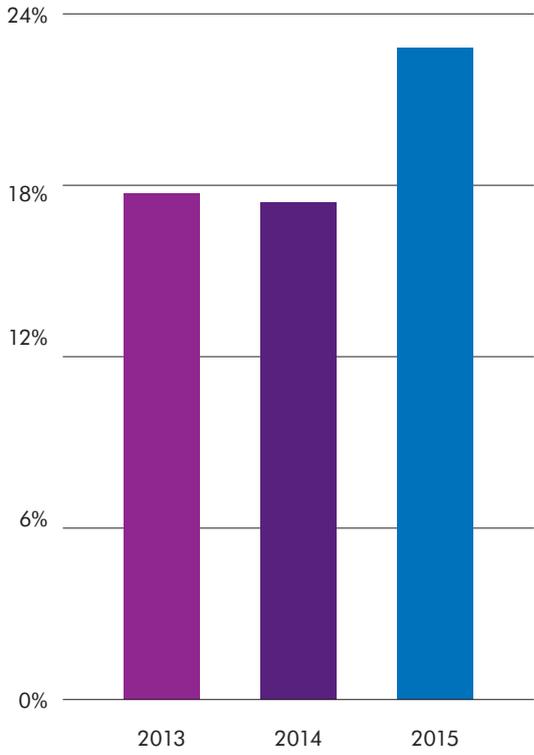
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## FACTS ON PEOPLE

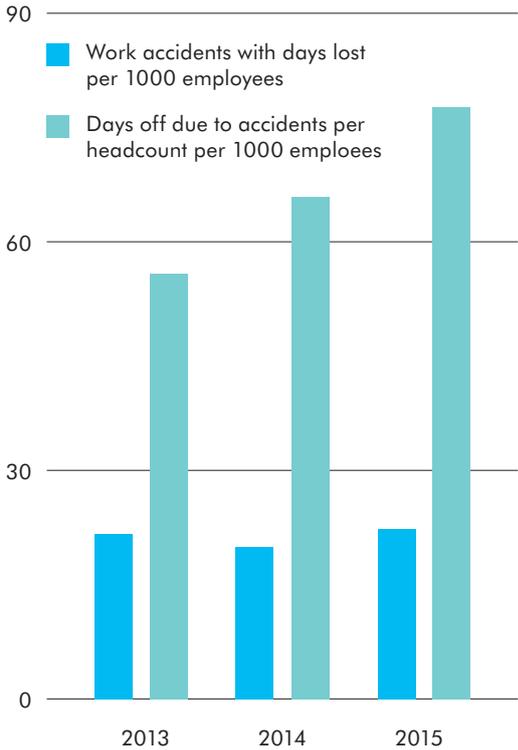
Gender Ratio



Absolute Turnover



Work accidents with days lost



## 09

## CORPORATE CITIZENSHIP

Santa Fe financially contributes towards three main charities. Santa Fe and our employees remain active in supporting local communities. We believe that whilst we provide financial contributions we can also contribute our time, expertise, resources and experience.



Santa Fe Group continues to make trucks available for disaster relief when tsunamis, earthquakes, typhoons or other natural disasters strike. In addition Santa Fe Group provides logistical services to charities and local communities for a variety of events. Various activities took place in 2015 and Santa Fe continues to promote a culture whereby we care about our communities not just as an organisation but also as individuals.

Santa Fe Australia are proud supporters of Red Kite, committing to A\$20,000 per year in corporate sponsorship. Red Kite helps to support the families of children living with cancer and is a well-known and highly respected charity within Australia. On top of our base level of commitment, we also fundraise and participate in additional events when the opportunity arises. Recently our team in Melbourne raised over A\$150 in a Christmas raffle, and Perth held a morning tea and participated in the Trade a Treat fundraiser which totaled A\$300.

Santa Fe Asia contributed USD 5.00 per booked move to Johns Hopkins Medicine in Baltimore, Maryland. Johns Hopkins is one of the world's pre-eminent health care institutions, and its researchers have made a tremendous contribution in deciphering the mechanisms of cancer and discovering new treatments. A total of EUR 68,000 was raised through booked move donations.

Santa Fe Europe contributed EUR 54,000 to Bertram's Junior School in Johannesburg, South Africa which is a Charity set up to help make a difference to the lives of its children many of whom have had their family lives destroyed by conflict or by social disasters like HIV/Aids. These donations will help to develop a school expansion and to provide necessities such as books and food for the students.

## CORPORATE CITIZENSHIP (CONTINUED)

### Australia

In November the staff of Santa Fe Australia attempted to grow moustaches throughout the month of November to support 'Movember', which raises money for men's health, specifically prostate cancer and mental health. They held a morning tea at the end of the month with donation tins, and in total raised A\$250 for this cause.

During October our Brisbane branch collected feminine hygiene products for the Share the Dignity Campaign. This organisation works to source and distribute much needed products to women in homeless shelters across Australia who may not have the means to purchase the products themselves. Shelters across the globe list these products as one of the most valuable physical donations that you can give, with a great number of generous donors never even considering the impact that something so simple can have in the everyday lives of those living on the streets.

### China

Santa Fe Shanghai continue to support Heart to Heart, a non-profit community outreach organisation who rely solely on volunteers who donate time and money to give support to children from extremely poor families who are undergoing heart surgery. The last donation of clothes, shoes, school supplies and any other usable items for children was 20 cubic meters. Santa Fe Beijing is the official logistics sponsor for Roundabout Beijing, transporting donated items to shops and recycled cartons for storage and transportation of such items. The charity was started to provide assistance to raise funds to support medical costs for orphans, sheltered housing for the elderly or those in need.



### India

In the aftermath of floods in August 2015 that killed more than 100 people in Northern India and Nepal and left thousands homeless, our team in India mobilised to help. Santa Fe India team members contributed to the relief effort by contributing money to buy more than 100 blankets, tents and clothes. The India team contributed money to the local NGO Goong which supported victims by sending relief materials to victims in Srinagar.

In support of their efforts, Santa Fe India arranged free logistical support to collect the material from various collection points and deliver to their central collection hub. We also arranged a full truck of relief material in our own truck from New Delhi to Srinagar in Northern India.

### Indonesia

Santa Fe Indonesia worked with a local consultant to create a hydroponic garden on the roof of our Jakarta office. The team were trained to plant vegetables and the skills and knowledge learnt were passed on to several local communities to show them how they too could start their own hydroponic gardens.

### Poland

Santa Fe Poland partnered with Sygma Bank to assist in the refurbishment of a local orphanage. The team provided logistic services, delivering furniture to the orphanage.

### Spain

Santa Fe Spain donated Computer equipment to Asociación juvenil El Gallo de Santo Domingo - Youth Association for the Integration of immigrants without resources. The project is aimed at promoting acceptance and facilitating access to employment for young immigrants in social exclusion, through a sustainable entrepreneurship, which promotes personal autonomy and ensure their socio-professional integration in society.

### Thailand

Santa Fe Thailand held a badminton Championship to raise money that helps provide dog food at a no-kill shelter for stray animal in Saraburi Province. The shelter currently takes care of 1,400 stray dogs and over 300 stray cats. The event raised more than THB 10,000, the team also donated wood to build dog houses in order to improve the shelter.

# 10

## REDUCING OUR ENVIRONMENTAL FOOTPRINT

We pride ourselves on being a responsible organisation and have committed to continually improving our environmental performance and preventing pollution. We support and comply with all environmental legislation and advocate a precautionary approach with regard to environmental concerns.



At Santa Fe, we believe that our people are the foundation of our success, not just in our business operations but also in our drive to improve environmental performance. As a result they are fully involved in our environmental programmes, as part of our CSR programme. At a local

In 2015 the Environmental committee in France undertook a number of environmental initiatives to raise employee awareness and collaborate efforts to reduce their environmental impact. These initiatives ranged from placing recycling boxes in the kitchen for recycling coffee capsules, to setting up a compost bin and improving the paper recycling process.

Santa Fe's Environmental policy is intended to be sustainable and is being integrated into our day-to-day business practices. As such, this policy is communicated to all staff members and is also available to the public. Santa Fe applies recognised Environmental Management Systems such as ISO 14001:2004 (or its local equivalent) based on the principle of continuous performance improvement. These systems are the basis for the deployment of key elements which include risk analysis, monitoring of environmental performance and compliance to regulations and permits, follow-up of the corresponding corrective actions, review of performance and improvement plans by the management.

Our objectives are to reduce our impact on the environment year-on-year by:

- Becoming more energy efficient, thereby reducing our greenhouse gas emissions.
- Minimising our waste by applying a reduce-reuse-recycle philosophy.

Our business has environmental impacts from the packing material we purchase and their disposal. With a fleet of over 540 vehicles we acknowledge this as being a huge environmental consideration for Santa Fe. Our vision and goals focus on reducing our impacts at each stage of our value chain and making a positive difference to the world in which we live.

A key achievement in 2015 was Santa Fe Hong Kong's Award for Environmental Excellence. The Hong Kong office successfully won the Transport and Logistics certificate of merit awarded by the Environmental Campaign Committee (ECC). This was in recognition of the efforts to promote environmental practices and management.

## REDUCING OUR ENVIRONMENTAL FOOTPRINT (CONTINUED)

### Waste

Our reduce-reuse-recycle philosophy has led to some positive recycling results in the past three years. 2015 saw a reduction in the amount of waste recycled which can be attributed to a significant amount of available waste that was recycled in 2014. There was a significant reduction of 48.7% in the amount of waste sent to landfill, however, there was an increase of 14.7% of waste incinerated. In 2016 we aim to recycle 75% of all available waste and reduce the amount of waste sent to landfill by 2%. This can be achieved by placing an even greater emphasis on the importance of recycling, providing awareness training for employees as well as the resources and systems in place to maximise our recycling potential.

### Reduce

Santa Fe's Household goods services continues to be heavily reliant on natural resources in particular materials such as paper, cardboard, plastic etc. Santa Fe Australia has successfully made the transition to using 'Enviwrap' (a material based alternative to cardboard packaging which reduces the amount of cardboard and tape used during packing), for intra-country moves.

The mass of materials used per household goods move continues to decrease and can be attributed to various initiatives such as educating packers on efficient packing, density packing and using the original manufacturers packaging where available.

### Reuse

Santa Fe has looked at a number of opportunities for reusing packing material, these have ranged from being donated to help local charities, aiding with local relief work, being re-used on household goods moves; where the quality and integrity of the packing material has not been compromised.

### Recycle

Santa Fe London has a partnership programme with their packing supplier where all waste is collected and recycled back into packing material. This has been a great initiative and seen positive results with 0% of waste being sent to landfill.

Santa Fe has a number of initiatives surrounding recycling such as recycling bins made available for office paper, tin cans, and printer cartridges, as well as for packaging material.

### Technology

Microsoft Sharepoint 2010, Yammer Technology and Skype for Business, is revolutionising the ways we communicate and at Santa Fe we also recognise the need for technology that is environmentally friendly. Following on from the initial rollout of Skype for Business, which offers messaging, voice and video calling capabilities and enables people to communicate remotely, we extended this offering in 2015 to include Yammer, the enterprise social networking software. Everyone at Santa Fe now has this software installed. It has created a new communication platform for our business. Our investment in these technologies has enabled teams who work remotely to meet virtually - capturing financial savings, ensuring better work-life balance for colleagues in international roles, and reducing our carbon footprint.

### Energy

The amount of electricity consumed in 2015 decreased by 0.89% this result can be attributed to creating and maintaining sustainable warehouses and also continuous management and awareness building with all our employees globally.

### Trucks

As we grow and increase sales and delivery of our services, we continue to look for ways to increase the efficiency and reduce emissions levels of our fleet. Many of these initiatives have required no additional investment; by promoting the choice of lower-emission models for our fleets, continuously improve the way in which they are maintained and how their routes and volumes are scheduled. This has resulted in a 0.14% decrease in fuel per tonnage moved.

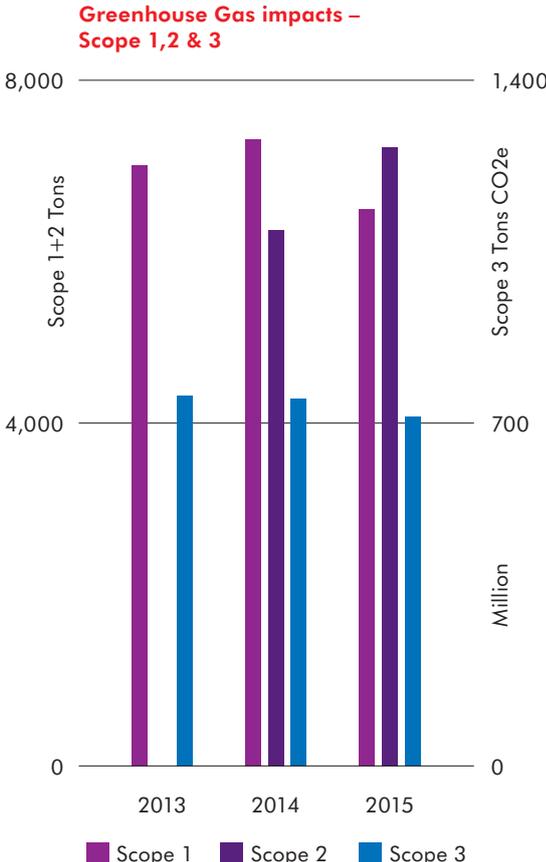
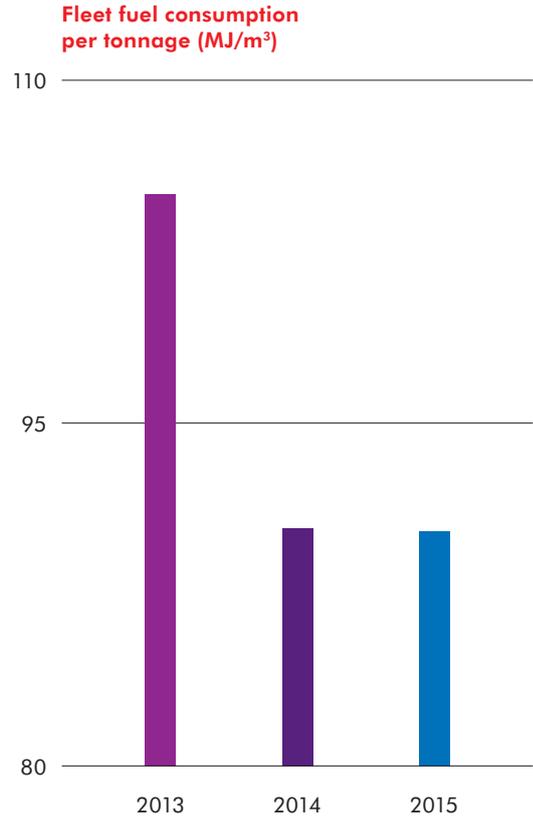
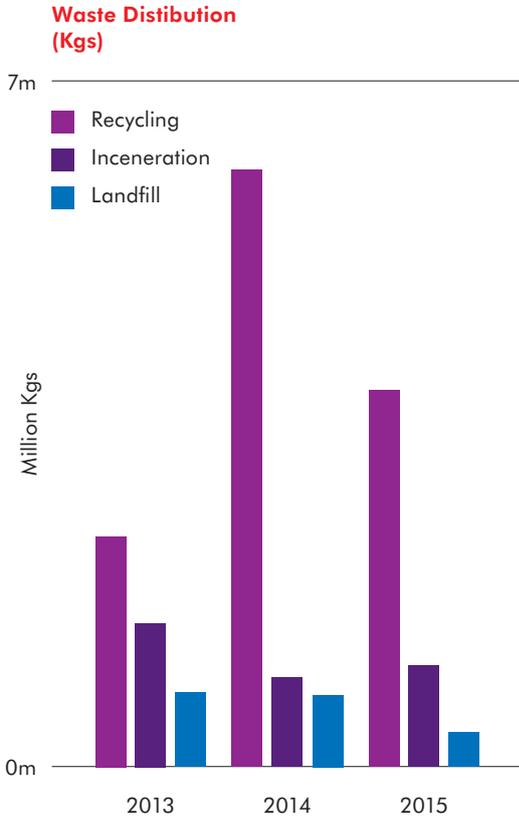
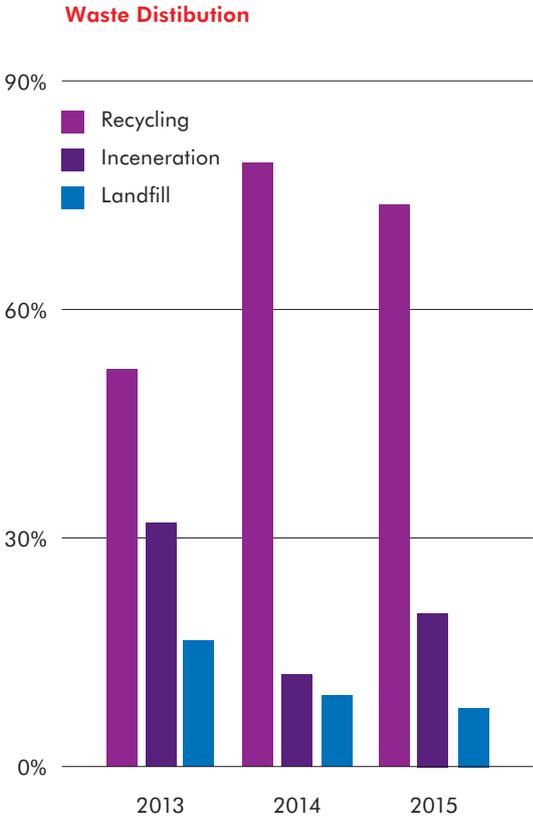
### Greenhouse Gas Emissions

Santa Fe has continued to monitor its GHG emissions. We continue to work with our offices globally to improve the data quality to allow better and more in depth reporting of our Scope 1, 2 and 3 GHG emissions. Fuel continues to be Santa Fe's biggest contributor to its Scope 1 and 2 emissions and we are committed to working on initiatives and ways in which we can reduce the impact of our fleet.

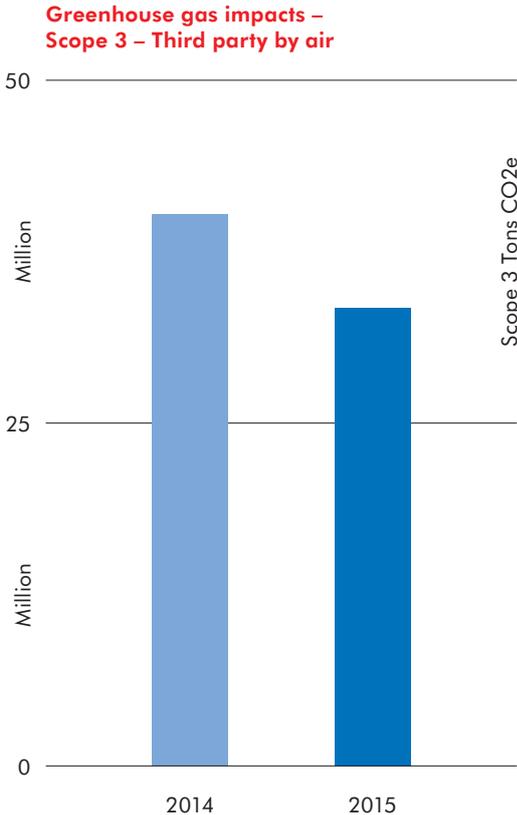
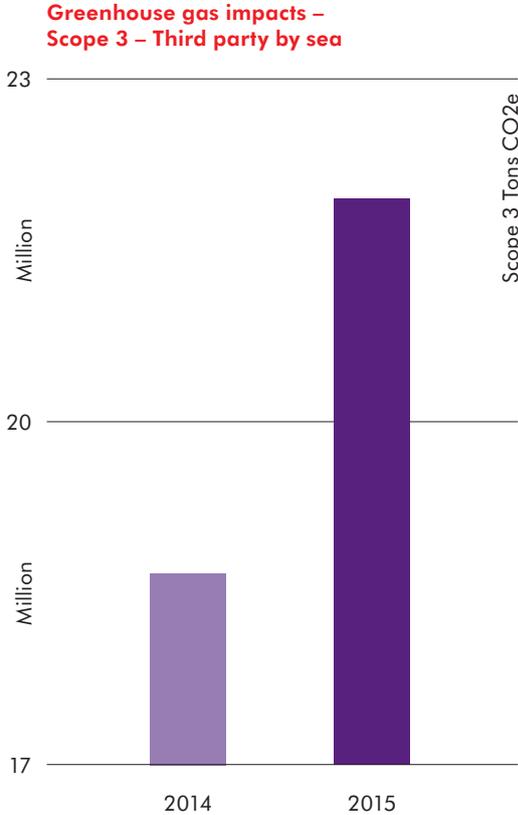
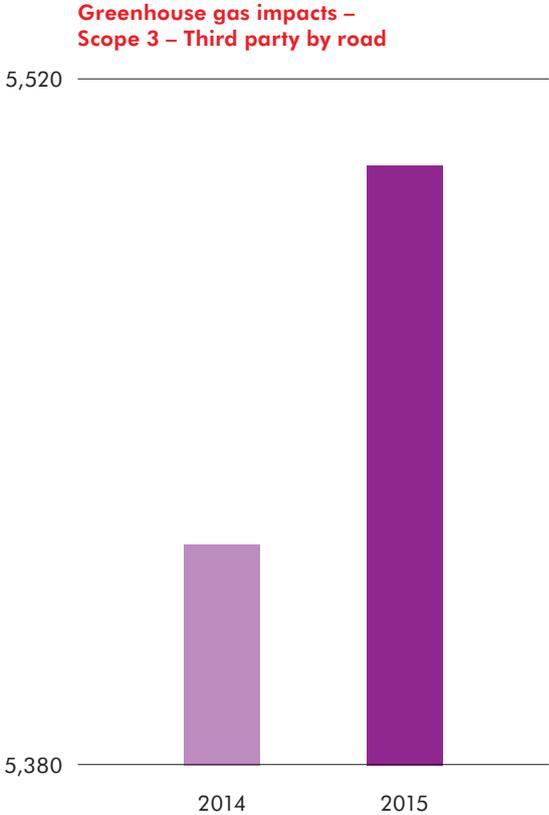
In 2014, Santa Fe begun to collect data to allow reporting of relevant Scope 3 GHG emissions.

One of our objectives for 2015 was to collect data from our Australian offices to provide a better indication of our overall relevant Scope 3 GHG emissions impact. We are pleased to confirm that this objective was met.

# REDUCING OUR ENVIRONMENTAL FOOTPRINT (CONTINUED)



# REDUCING OUR ENVIRONMENTAL FOOTPRINT (CONTINUED)



# 11

## RESPONSIBLE BUSINESS AND ANTI-CORRUPTION

**Our main activities covering the principles in UN Global Compact regarding Anti-Corruption are detailed within our Code of Business Conduct and Staff Guidebook. According to these, all Santa Fe Group employees are expected to:**

- Apply a zero tolerance approach towards corruption, extortion and bribery.
- Behave honestly, are trustworthy and set a good example.
- Do not pay or accept bribes in any form.
- Do not accept or provide gifts, invitations or other advantages which could create a possible conflict of interest.
- Ensure that they do not engage directly or indirectly in fraud against any of our partners or government entities.
- Ensure that they do not engage directly or indirectly in bribery.
- Refuse to pay any bribes, including small amount bribes or facilitation payments.

### ABC training

The Santa Fe Anti-Corruption Policy cements and elaborates our position against corruption and bribery as set out in the Code of Business Conduct. To ensure that all managers and key employees understand and recognise the position of Santa Fe against corruption and bribery, we made available e-learning based compliance training. In 2016, the target is for Anti-Bribery and Corruption eLearning to be rolled out in different languages. In addition to this Santa Fe aims to provide an Anti-Money Laundering eLearning programme to further educate our employees against anti-corruption practices.

### Whistleblowing

Santa Fe's Whistle-blower programme encourages employees to take up any difficulty or question relating to the application of the Code of Conduct with its hierarchy and other identified interlocutors in a confidential manner. The Whistle-blower system is aimed at identifying corrupt practices or suspected violations of laws and regulations, extortion, fraud, bribery and other forms of corruption or ethical concerns.

### Data security

Santa Fe continues to follow the requirements of ISO 27001 Data Security Management to ensure that all data and information that interacts within our Company is secure. Santa Fe undergoes regular audits via certification bodies, internal audits and also audits by our corporate customers. ISO 27001 is the internationally recognised standard for establishing, implementing, maintaining and continuously improving Information Security Management. It demonstrates our ability to deliver secure reliable solutions for both Santa Fe and our customers and 11 locations have received formal certification to ISO 27001.

Santa Fe demonstrates an ability to efficiently handle data through robustly managed processes. By achieving and maintaining certification it has allowed us to strengthen the levels of trust between ourselves and our customers, improving our ability to securely manage their data and at the same time providing assurances that we are following ISO 27001 information security best practice.



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## SUPPLY CHAIN INTEGRITY

We need to ensure that we do not expose ourselves or our clients to operational or reputation risk from the actions of our suppliers. We engage a wide variety of suppliers around the world — from large, global technology providers to small, local diversity suppliers and recruiters of specialised talent.

Santa Fe has identified the need to strengthen and broaden our risk-based approach to addressing concerns that may arise from our supply chain. A key priority in 2016 will be the revision of the Santa Fe Partner Agreement which will place strong emphases on Compliance requirements.

Higher risk suppliers in each of our markets are asked to provide positive assurance that they adhere to our policy and also complete quarterly declarations on any instances of corruption within their organisation or any work accidents whilst undertaking services on behalf of Santa Fe. Many of our largest global suppliers have key social responsibility principles embedded into their contracts and are required to participate in Anti-Bribery eLearning provided by Santa Fe.

We believe that an open and honest dialogue will benefit our Stakeholders as well as our Corporate Social Responsibility efforts, and we invite you to participate. Feel free to contact us with any questions or comments on [certification@santaferele.com](mailto:certification@santaferele.com)