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United Nations Global Compact Vesper Group Communication on Progress

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2 CEO STATEMENT OF CONTINUED SUPPORT OF THE GLOBAL COMPACT

As Chief Executive Officer of Vesper Group, I am pleased to confirm that Vesper Group reaffirms its support of the Ten Principles of the United Nations Global Compact in regard to Human Rights, Labour, Environment and Anti-Corruption.

Vesper Group is a risk and security consultancy that specializes in providing integrated solutions to corporations, governments and humanitarian organizations worldwide. Although situated in Stockholm, a large portion of Vesper Group's operations take place in high-risk contexts. The company has played a leading role in the establishment of norms of quality and human rights in the private security industry. Vesper Group is the only European Non-British company certified to PSC.1 and ISO 18 788. Vesper Group have also been members in the development and establishment of the International Code of Conduct for Private Security Providers, as well as members of the International Code of Conduct Association since the founding of the organization.

This Communication on Progress is Vesper Group's second after joining the UN Global Compact in 2014 and outlines our continuous efforts to incorporate and implement the Global Compacts principle throughout every level of our company and perspective of our services.

With best regards,

Erik Lewin

Chief Executive Officer

Vesper Group, Stockholm



3 HUMAN RIGHTS

Principle 1:	Business 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.

3.1 Commitment

Vesper Group's obligation to adhere to and respect human rights permeates the whole organization, from top management down to operators on the ground, from documented procedures to culture and norms. Vesper Group's commitment to the UN Global Compact's principles on human rights is reflected for instance in our Code of Conduct, read and sign by all Vesper employees, which states:

General behaviour and conduct [of Vesper employees] shall reflect and adhere to the universal values of the United Nations, as described in the Universal Declaration of Human Rights, including respect for human rights, human dignity, equal rights for men and women, non-discrimination, social justice and security.

All Vesper employees and consultants have a responsibility and obligation to report to his/her supervisor all potential or actual human rights abuses. Suspicion or knowledge of the commission of war crimes, crimes against humanity, genocide, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, trafficking of weapons or drugs, child labour, and extrajudicial, summary, or arbitrary executions shall be reported.

Vesper Group's Code of Business Conduct, which all clients and suppliers must read and sign before conducting business with Vesper Group, further details Vespers commitment to respecting and obeying to human rights;

[The] Code of Business Conduct has been developed for the purpose of protecting human rights, promoting fair employment conditions, safe working conditions, responsible management of environmental issues, respect human life and high ethical standard.

Vesper Group supports the United Nations Global Compact initiative. In order to make clear to employees, suppliers, customers and other stakeholders, the Code of Business Conduct is based on the Global Compact's ten principles and shall be publicly available. Vesper Group is also committed to implement the United Nations Guiding Principles on Business and Human Rights throughout our business operations.



Although Vesper Group's services are situated in contexts which potentially poses specific challenges to human rights, we are eager to take responsibility and action to make sure that human rights are maintained in all aspects of Vesper's services. This is also stated in our Code of Business Conduct:

Vesper Group is aware of the specific challenges to human rights in certain environments of operation, and we work actively to minimize any risks and challenges to human rights.

Vesper Group respect all internationally proclaimed human rights, including the International Bill of Human Rights, and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honour the principles of internationally recognized human rights, even when faced with conflicting requirements.

Further, Vesper's Security Operations Manual and Policy states that:

Vesper Group has developed and implemented a Security Operations Management System (SOMS), which is integrated in our Quality Management System, in order to document the company's best security operations' practices, safeguard its security operations and its clients while ensuring respect for human rights, applicable laws and fundamental freedoms and to continuously improve the overall management of its security operations.

Thus, human rights are an integrated part of Vespers documented management system which outlines the routines, procedures and culture that Vesper Group's services assume from. Vesper Group's Code of Conduct, Code of Business Conduct and Security Operations Manual and Policy are publicly available on Vesper's website.

3.2 Implementation

Engagement in the application of human rights standards in the private security industry: Vesper Group have been actively engaged in the development of the Montreux-document, the International Code of Conduct for private security companies (ICoC) and International Code of Conduct Association (ICoCA). The purpose of the ICoC, Montreux-document and ICoCA has been to articulate human rights responsibilities of private security companies, and to set out international principles and standards for the responsible provision of private security services, particularly when operating in complex environments.

Assessment and due diligence: Human rights risk assessment is a part of Vesper's main business process. Before acceptance of a business opportunity, Vesper evaluates the human rights risks associated to the region where the service(s) will be undertaken, as well as cross-references potential clients to UN sanction list. In addition, Vesper annually performs a human rights risk impact assessment for the regions where Vesper conducts operations and where the enforcement of the human rights may be diminished. The purpose of the human rights risk impact assessment is to recognize specific risks of human rights abuses in context to Vesper's



services and identify counter-measures for Vesper to undertake in order to ensure upholding of human rights in reference to our services.

Whistleblowing and grievance mechanisms: Vesper Group provides a platform for complaints by employees and third-parties to allow issues, including those related to human rights, to be addressed. Parties can do so anonymously. Vesper Group's Whistleblowing policy and grievance mechanism are publicly available on Vesper's website.

The Ethics Committee: Vesper Group's Ethics Committee is responsible for the review of human rights and other ethical issues that have or may arise in conjunction with Vesper Group's activities.

External Engagement: Vesper Group engages in platforms for human rights, including the ICoCA General Assembly Meeting in September 2016.

Human rights training for employees: This year Vesper have initiated human rights training for all employees. This includes an introduction to human rights, what they are and how to recognize and report human rights abuse.

Certification according to ISO 18 788 and PCS.1: Vesper are now certified to PSC.1 as well as ISO 18 788 by MSS Global, which is a guarantee by an impartial third party that Vesper is accountable to law and respects human rights.

3.3 Planned activities

Grievance and whistleblowing policy review: Vesper Group will review the possibilities available to outsource the grievance reporting to further strengthen our grievance mechanism and ensure impartiality in every aspect.

Increase our engagement with human rights forums and professionals: Vesper Group aims at increasing our engagement with human rights experts and forums, this will include the continued engagement with the UN Global Compact forums and activities.

Continued and intensified work with ICoCA: Since November 2016 it is possible to apply for a full membership in ICoCA. Vesper Group will continue to deepen our engagement with ICoCA and apply for a full membership 2016/2017.

3.4 Outcomes

Vesper Group has not experienced known complicity by its staff of breaches against international human rights standards.

4 LABOUR

Principle 3:	Business 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.

4.1 Commitment

Through our policies and procedures Vesper Group ensures that the highest standards of welfare are provided for personnel. Vesper Group's commitment to Global Compact's principles on Labour is stated in our Code of Conduct, which demands:

Compliance with and respect for the labour-conventions as established under the leadership of the International Labour Organization (ILO), including the fundamental ILO conventions (freedom of association and protection of the right to organize, abolition of forced labour, minimum wage, worst forms of child labour, non-discrimination etc.)

As well as:

Support of the ILO-driven principle to promote opportunities for men and women to obtain decent and productive work in conditions of freedom, equality, security and dignity.

Vesper Group's commitment to Global Compact's principles on Labour is also reflected in our Code of Business Conduct. The policy includes reference to:

Freedom of Association – *All employees shall be free to form and to join, or not join, trade unions or similar external representative organizations and to bargain collectively. Information and consultation with employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.*

Forced Labour Avoidance - *Forced, bonded or compulsory labor shall not be used and employees shall be free to leave their employment after reasonable notice as required to ledge deposits of money or identity paper with their employer.*



Fair Employment Conditions – Employees shall understand their employment conditions. Pay and terms shall be fair and reasonable, and comply at a minimum with applicable laws or industry standards, whichever is higher.

Child Labour Avoidance – No person shall be employed who is below the minimum legal age for employment. Minimum age is the age of completion of compulsory schooling, or not less than 15 years in countries where educational facilities are insufficiently developed.

Elimination of Discrimination – All employees shall be treated with respect and dignity.

Fair Working Conditions – A healthy and safe working environment and, if applicable, housing facilities shall be provided for employees, in accordance with international standards and national laws.

Vesper Group's commitment to the UN Global Compact's principles on labour is also reflected in other key documentation, including the Equality and Discrimination Policy and the Procurement Process which describes how preferred vendors, suppliers and consultant are evaluated, elected and purchased.

4.2 Implementation

Whistleblowing and grievance mechanisms: Through our Whistleblowing Policy, staff and volunteers are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals and Vesper Group will protect them from victimization and dismissal. Vesper Group have a Grievance Procedure which clearly outlines the procedure that staff can take to ensure they can resolve any complaints or grievances relating to their employment.

Health and safety policy: The Health and Safety Policy demonstrates the Vesper Group's intention to promote a safe and healthy working environment for people working on its behalf. It includes reasonable precautions including the provision of preventative training, equipment and the establishment of safety routines.

Equality and discrimination policy: Vesper fulfils its responsibility for promoting equal opportunities and combating discrimination, seeking to ensure the full integration of each employee in his or her working environment regardless of ethnic or social origin, race, gender, religion, nationality, sexual orientation or other distinguishing characteristics. All Vesper employees are committed to treating each other with dignity and respect, regardless of background or level and understands that each employee has a valuable contribution to make to the overall success of the company.

4.3 Planned activities

Grievance and whistleblowing policy review: A review of Vesper Groups grievance mechanism shall be conducted to ensure equal and just treatment and in all cases in order to avoid conflict of interest.



4.4 Outcomes

Vesper Group has not experienced any breaches against the labour principles of the Global Compact.

5 ENVIRONMENT

Principle 7:	Business should support a precautionary approach to environmental challenges;
Principle 8:	Undertake initiative to promote greater environmental responsibility; and
Principle 9:	Encourage the development and diffusion of environmentally friendly technologies.

5.1 Commitment

Vesper Group is committed to Global Compact's principles on environment as is reflected through our Code of Business Conduct (for suppliers and clients), our Code of Conduct (for employees) as well as our new Environment Policy.

By signing Vesper Group's Code of Business Conduct, suppliers and clients agree to

...strive to develop, produce and offer services with excellent sustainability performance and contribute to sustainable development of society. We shall strive to continuously improve, with a life cycle perspective, the environmental performance. We shall work to continuously reduce the negative impact of our own operations and take a precautionary approach to environmental challenges.

... use appropriate methodologies to determine significant issues and aspects, for setting and reviewing objectives and targets, and as a basis sustainability performance of our operations and services.

By signing our Code of Conduct, employees agree to

Promote and strive for an environmental friendly approach including considering environmental friendly technologies and materials, recycling policies and practices, and less harmful working methods to minimize impact on the environments and its resources.



Further, Vesper Group's Environmental policy states that:

Vesper Group operates in compliance with applicable environmental regulations and mainstreams environmental considerations into all areas of operation in order to assume our responsibility in creating an ecologically sustainable society. Vesper Group is aware of increasing global environmental issues and works to limit the direct and indirect environmental impacts of its operations.

5.2 Implementation

Vesper Group's environmental engagement allows us to strive at

- creating healthy environments for our employees, to reduce the organizations environmental impact and to use energy and resources in an effective manner during the entire lifecycle.
- creating healthy environments, in which the services have the least interference with the environment and humans
- in all its activities, reducing our climate impact, reduce energy consumption and use green energy.
- in all services and for use at the head office, only use environmental friendly material.
- in all its activities, reduce waste and contribute to recycling and resource efficiency.
- actively identify and prevent environmental risks.
- continuously improve the environmental awareness and understanding of our employees with the appropriate information, training and support.

5.3 Planned activities

New office: New office space is being identified and considerations will include environmental factors.

Broaden and deepen our risk impact assessment: Vesper Group will review the possibility to broaden our annual risk impact assessment to include and deeper investigate our environmental impact.

5.4 Outcomes

Vesper Group has not experienced known complicity by its staff of breaches against the principles on the environment.



6 ANTI-CORRUPTION

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

Vesper Group is committed to the very highest of ethical standards in relation to business integrity. Our commitment to the UNGC's principles against corruption is expressed in our Code of Business Conduct in which it states:

No form of extortion and bribery, including improper offers for payments to or from individuals performing work for Vesper Group, or organizations, shall be tolerated.

Vesper Group expects Suppliers to adhere to the highest standard of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum.

6.2 Implementation

Procurement and Human Resources Policies: Employment contracts and Vendor agreement covering subcontracted and outsourced services under Vesper Group's Security Operations division must include the commitment by vendors to abide by same legal, ethical and human rights requirements as Vesper Group and processes for reporting risks.

Whistleblowing and grievance mechanisms: continuously improve the environmental awareness and understanding of our employees with the appropriate information, training and support.

The Ethics Committee: Vesper Group's Ethics Committee is responsible for the review of corruption or other ethical issues that have or may arise in conjunction with Vesper Group activities.

6.3 Planned activities

Vesper Group will assess when and where risks of corruption are greatest and will ensure that relevant policies and processes, including as regards to procurement and training, and will reflect findings in order to address risks identified.

6.4 Outcomes

Vesper Group has not experienced any incidents of corruption.



7 SUMMARY

Vesper Group have pledged our commitment to conform with and promote the Global Compact and its principles. Each principle, as demonstrated, has been integrated within Vespers' Management System, culture, processes and values. These processes, policies and other documents have been reviewed by an impartial auditor and tested against the requirements of PSC.1 as well as ISO 18 788.

Vesper Group have a continued central role in the consolidation of high professional standards in the security industry, especially in relation to human rights, labour and anti-corruption in conjunction with our continuous strong engagement in the ICoCA, and we will continue to review and improve our work with human rights, labour, environment and anti-corruption.