



2016 U.N. Global Compact Communication on Progress

February 2015 – February 2016



CEO Statement

BROWZ recognises the role that the diverse business community in which we operate must play in making changes to how global supply chains are perceived by stakeholders and consumers alike.

As an organisation that can influence how supply chains are managed in a global arena, we acknowledge and accept our role as a corporation to embrace the ten principles of the United Nations Global Compact by embedding these within our product offerings and corporate culture.

Through this approach, we integrate the principles of human rights, social, environmental and ethical considerations into our business operations, strategies and the products offered to our clients.

To reinforce our approach to ethical and transparent business practice we committed to joining the Global Compact in early 2013.

Since joining the programme the business has developed and implemented assurance and pre-qualification programmes that not only assist in the mitigation of supply chain risk, but they also assist major organisations working in a wide range of sectors to enhance working conditions, maintain sustainable sourcing of materials and minimise their impact to the environment. We have seen far more attention within our client base on issues such as sustainability, responsible sourcing and greater business transparency.

To maintain sustainable business growth within our global network of suppliers, we ensure that we continually monitor industry trends and best practice to meet the challenges facing a changing global supplier interface.

In mid-2013 we committed that we would increase our global footprint in an ethical and transparent manner that would also reduce our environmental impact. In our 2016 statement, we are just as committed to this being an ongoing part of our business philosophy and corporate culture where we actively encourage worker participation at all levels of our global operation.

We are pleased to renew our commitment supporting and complying with the UN Global Compact as detailed within our Communication on Progress



Elaine Beitler
CEO BROWZ LLC
February 2016



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Introduction

BROWZ works with both domestic and international organisations assisting them in creating and maintaining a sustainable supply chain. We not only collect and analyse supply chain data using bespoke software that is subject to strict governmental controls; we also provide expert analysis and monitoring services to all levels of a diverse supplier network.

The information we provide is intended to enable our clients to make educated decisions about their procurement strategies to meet stakeholder, shareholder and consumer expectations.

As a global business, we view corporate social responsibility including business transparency as a strategic element of our business growth and as part of our customer product range. We recognise that this area is essential to maintaining a business that works with clients that can have a domestic or global footprint while allowing the reconciliation of business transparency and the prevention of anti-corruptive practices, reduction of environmental impacts and social and human rights. Many of the issues that the United Nations Global Compact addresses are explicitly covered within the laws of the countries in which we operate.

We also strive to meet the social standards as defined within the principles of the global compact. We do this by ensuring that we treat all our workers responsibly and independent of their employment status as well as our clients, suppliers and the environment. We have also integrated other ethical standards that address new sectors we have commenced working within during the last business year and meet the requests made by our clients.

This Communication on Progress accounts for corporate activities during 2015. It is intended to capture our contribution as a committed signatory to the United Nations Global Compact.

The Global Compact's ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption and its approach to corporate sustainability are consistent with our approach to responsible business in the global arena.

We have developed and modified our Code of Conduct in 2015 to encourage greater vigilance in the areas of cyber criminality and reduce our environmental footprint further. This allowed us to establish corporate rules encouraging ethical behaviour internally and when we deal with client based representatives, colleagues, suppliers and competitors. This message is shared with our clients so they understand our strong stance in this area.

This Code is now a formal element of all employment contracts and we expect our employees to fully comply with it. The codes have all been endorsed by the most senior representative within the business and relate to confidentiality and professional integrity, personal conduct, data integrity and corporate responsibility and the maintenance of a safe working environment and a reduction of our environmental impact.



Human Rights

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2:

Make sure that they are not complicit in human rights abuses.

The Company has recognised the importance of ensuring that all personnel are engaged and treated in an equal manner across global operations, while respecting human rights not only within the business but also as we engage in business relationships.

We have a formal partnership with an independent 3rd party organisation that specialise in advising and guiding expanding global organisations that are expanding on meeting all necessary and relevant legal obligations and where we extend this obligation and exceed our legal mandate we are still within the confines of all applicable legislation.

We have further started working with an organisation that provides us with industry best practice guidance on human resources and employment legislation that encapsulates our global operation.

We have an internal handbook covering all levels of employment, which references all internal policies that focus on the highest levels of engagement with our workforce.

In addition to the handbook, we have also addressed how members of the workforce can discuss any issues with any member of the senior management team as we strive to maintain an “open door” policy relating to the deployment of our corporate Human Resources policy. To also reflect how we value our workforce, human resources (HR) are represented at executive level with a newly appointed Vice-President for our global HR operation.

To ensure that we provide a safe working environment and maintain the wellbeing of all members of the workforce independent of their geographical location, we have created a safety committee that is managed from our office in the United States, the committee membership comprises of individuals located in different

locations throughout our global operation. This committee has been developed to allow any member of the workforce to provide input to allow us to enhance working conditions and, where required, introduce a network of health and safety measures such as foreign travel risk assessment and workplace ergonomics.

In 2015, we expanded the remit of the committee to cover other areas of compliance including social responsibility where we actively encourage worker participation in localised initiatives that assist the local communities in which we operate and also environmental programmes that encourage worker participation including “green” initiatives suggested by the workforce to reduce waste within the business.

As our product range starts to grow, we recognise that our clients also aspire to improve human rights and working standards throughout their supply chain. To address that need, we have created product offerings intended to assist our clients to help achieve their corporate goals in the areas of corporate social responsibility, sustainability and workplace health and safety.

Our business has been requested to assist some of our client’s in the sourcing of suppliers located in developing economies. We are actively working to help in the education of the importance of not only addressing human rights but also looking at methods that can be employed in the selection and monitoring of suppliers how the issue of human rights can be subject to continual improvement within all levels of the supply chain.

We have expanded our services to also address the human rights element within the sourcing of materials used within a company’s manufacturing and sourcing process.

To assist our clients with the development of workplace safety standards we have made the decision to work in an alliance with nationally recognised professional safety institutions, we are working on sponsorship and coordinated programmes on workplace safety initiatives that can be employed with our programmes and help to enhance the standards and actively reduce workplace risk on an ongoing basis and encourage this within our global business operation.

Labour Standards

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

Principle 6:

The elimination of discrimination in respect of employment and occupation.

To allow us to support labour rights within our workforce, it was important that we recognise that we employ individuals using a variety of methods which can include engaging with 3rd parties on long term placements within the business and as such we have worked hard to make sure that we treat all individuals with the same levels of respect and dignity. We have enhanced our corporate policy statements to ensure they reflect our stance to remove discriminatory practice in the workplace but also we have introduced country specific products that also address analysis of prevention of discrimination in the workplace.

Our engagement process, which covers any individual independent of their employment status or location, will always provide verification of their age and their identity with government issued documentation. To ensure due diligence in this area, we will maintain necessary copies of this documentation and the process is open to any form of independent verification. In some of the countries we operate, we understand that before we can make an offer of employment we must verify that they are legally entitled to work in that country and this can only be achieved by validating their identity documentation, this is always undertaken adhering to the employment laws in place in that country of operation.

We are committed to providing our employees with a work environment that is open, friendly and non-discriminatory, and that is fully in accordance with employment legislation in the countries where we operate. All our employees work for us of their own choosing and are all legal age and are not subject to any financial penalties when employed via a professional recruitment service.

We have introduced a risk programme to mitigate workplace risk and we have extended this guidance to allow workers to employ this guidance in their everyday lives. We also have safeguards in place designed to protect any worker who may wish to report a concern about business practice or activity of other parties that may impact upon their welfare or that of the business.

BROWZ complies with applicable local legislation regarding the principle of freedom of association and collective agreements in the countries in which we operate.

All members of the workforce are issued with formally documented terms of employment that clearly define their terms of employment including a clear breakdown on remuneration, holidays and their ability to leave this employment when they choose to do so.

We shall not engage with any organisation or client that allows or supports forced or bonded labour irrelevant of location. This stance is also applied to any form of underage labour. We work with our clients who utilise our services to remove these practices within their supply chain.



As part of our product offering we actively encourage and work with our clients to collect and evaluate demographic data on companies that operate within all tiers within their supply chain. This not only covers direct suppliers, it also addresses sub-contractors and suppliers of indirect services.

We have developed education programmes to communicate and where applicable evaluate areas of potential discriminative behaviour and actively assist in the verification of workers, their age and how they were recruited.

To provide our clients with the best possible service, we ensure all members of our workforce are provided with a detailed training program with a vast range of job specific subjects both when they commence employment and this is also undertaken on a continued basis to ensure that our personnel maintain their professional development. We also encourage our staff to undertake additional training and further education to further their careers and enhance their personal development.

Environment

Principle 7:

Businesses should support a precautionary approach to environmental challenges

Principle 8:

Undertake initiatives to promote greater environmental responsibility

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies

We recognise that as we expand and grow the business globally, we face the challenge of minimising our environmental impact. This will continue to be a challenge as our market share increases due to the demand for our services and the demands that can be placed on personnel to meet clients in a non-virtual environment.

We are committed to using internet media where possible to undertake meetings and deliver presentations as required by our clients. Where travel is unavoidable, we have opted to reduce our costs and have engaged a third-party specialist committed to finding the best travel solutions that not only ensure our personnel travel safely, but also with minimum impact to the environment and reduce our CO² emissions. We actively discourage the use of automobiles and where available encourage the use of public transport where it is available such as trains, trams and buses.

We have introduced localised recycling initiatives for our different offices to not only improve our ability to reduce and segregate waste that is sent to landfill, but where possible, we purchase materials that are either recycled or can be subject to recycling.

Anti-corruption

Principle 10:

Businesses should work against all forms of corruption, including extortion and bribery.

To demonstrate our commitment to the delivery of a transparent business relationship with all our clients, we developed a suite of policies and procedures that have been endorsed and undersigned at the highest level within the business. These programmes are subject to continual monitoring.

These policies include: Gifts and Hospitality, where we recognise that in some of the countries in which we operate the provision of gifts can be determined as being part of an accepted culture.

As a business that employs workers that audit and evaluate supply chain data on behalf of our client's, it is essential that this assessment and associated work process can withstand independent scrutiny in all aspects. As such all audit programmes and recruitment of the audit personnel are subject to a detailed code of conduct and associated code of practice that is signed by all participants.

The business has a zero-tolerance stance on any element of deviation of the content of the code.

We recognise the challenges that this can present and recognise that the way business is conducted can vary widely. For example, in some countries where enforcement of national or international standards may be weak, and to avoid causing offence but also recognise this important cultural difference, we have specified that any form of gift received irrelevant of value shall be recorded in a Register for Gifts and Hospitality maintained within our corporate Head Office.

Failure to declare shall be construed as a serious breach of company policy. Any gift with a monetary value more than 25 (US dollars) must be declined.

Business Transparency Policy – this identifies and confirms that we operate a zero-tolerance stance towards bribery or corruption, this policy has been reviewed and endorsed by our Executive Team and CEO. This Policy applies not only to employees, but also any agency who acts on behalf of the company. Any person representing

the business shall demonstrate their understanding and willingness to meet this mandate and they do so by signing a declaration acknowledging the content.

We value the fact that we have been entrusted by major corporations with information about their supply chains and as such we must ensure the integrity of this data. This has been done by the award of the Safe Harbor certification as recognised by the United States Government, this covers our global operation.

There is also in place an IT based security policy which is also part of the company's stance on protecting commercial data. BROWZ has adopted a series of Policies and Procedures based on COBIT, ISO27001 and Industry best practice.

These documents are reviewed by the CTO and BROWZ Information Security Team on an annual basis, and are read and signed by BROWZ employees annually as well. Policies and Procedures include but are not limited to Information Security:

Email Usage	Remote Access
Internet Usage	Social Media Usage
Password	Voicemail Usage

In addition to the policies noted above, BROWZ employees are mandated to review a series of web based training modules that speak to Information Security and the role they play within the BROWZ offering. These modules include but are not limited to:

Email Usage	Identity Theft
Social Engineering	Physical Security
Safe Internet surfing	Information Security
Dealing with Spyware and Viruses	