



ANVIL

Global Compact Annual Communications on Progress

United Nations Global Compact

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1.0 INTRODUCTION BY THE GROUP MANAGING DIRECTOR

The Anvil Group delivers security support to many large companies and organisations around the world, often in under-developed and struggling nations. We will often work in partnership with security professionals native or familiar to that country or region. We recognise that we must, where possible, integrate our business values and operations to meet the expectations of our stakeholders. They include customers, employees, regulators, investors, suppliers, the community and the environment.

When providing operational security services we fully embrace the principles of the United Nations Global Compact and ensure that we both promote and implement them not only in the work we do but also with our partners. Anvil engages the best possible expertise in security and has earned a reputation as an ethical security company that works with our clients and the host nation to apply the relevant Principles to all our security operations. By ensuring this practice in our work we can have a positive impact on local governance, peace and stability whilst ensuring the highest possible safety of our clients.

The Principles are also intrinsic to our own Visions and Values which we apply to all of our work and play a key role in guiding our policies and practices. This report comprises our annual Communication on Progress against our implementation of these Ten Principles.

Matthew Judge
Group Managing Director

2.0 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 abuse.

These two principles are core to our company's culture.

Commitment

Increasingly, customers and other stakeholders are looking to companies such as Anvil to demonstrate specific actions and practices that are aligned to internationally recognised standards such as the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Providers (ICOC).

It is also our aim to ensure a neutral working environment in which no employee or worker feels under threat or intimidated. These are the standards on which we base our human rights policies and practices.

Initiatives

We have continued to implement our human rights framework and embed its standards and awareness into our business policies and processes. The policy and its related framework aim to align the group's practices with the UN Guiding Principles on Business and Human Rights and to introduce additional global guidelines where necessary.

Our human rights framework supports the continued development of an ethical and sustainable business model that encourages the improvement of standards, job creation, community support and broader beneficial impacts on societies throughout the world. Specifically in 2015 we have:

Equal Opportunities Policy

We recognise that discrimination is unacceptable and although equality of opportunity has been a long standing feature of our employment practices and procedure, we have made the decision to adopt a formal equal opportunities policy. Breaches of the policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.

- The aim of the policy is to ensure no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- We will ensure that the policy is circulated to any agencies responsible for our recruitment and a copy of the policy will be made available for all employees and made known to all applicants for employment.
- The policy will be communicated to all private contractors reminding them of their responsibilities towards the equality of opportunity.
- The policy will be implemented in accordance with the appropriate statutory requirements and full account will be taken of all available guidance and in particular any relevant Codes of Practice.

Recruitment and Selection

The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.

- Promotion and advancement is made on merit and all decisions relating to this will be made within the overall framework and principles of this policy;
- Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications;
- We will adopt a consistent, non-discriminatory approach to the advertising of vacancies;
- We do not confine our recruitment to areas or media sources which provide only, or mainly, applicants of a particular group;
- All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do the job;

- All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate;
- Short listing and interviewing will be carried out by more than one person where possible;
- Interview questions will be related to the requirements of the job and will not be of a discriminatory nature;
- We will not disqualify any applicant because he/she is unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the job; and
- Selection decisions will not be influenced by any perceived prejudices of other staff.

Training and Promotion

Senior staff receive training in the application of our policies to ensure that they are aware of its contents and provisions. All promotion will be in line with this policy.

Monitoring

We will maintain and review the employment records of all employees in order to monitor the progress of this policy.

Monitoring may involve:

- The collection and classification of information regarding the race in terms of ethnic/national origin and sex of all applicants and current employees;
- The examination by ethnic/national origin and sex of the distribution of employees and the success rate of the applicants; and
- Recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.

The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and staff.

Supplier Interaction

Partners and suppliers can be confident that any business venture entered into with Anvil will be carried out on the basis of strong ethics and that any form of unethical behaviour (particularly bribery) will not be tolerated. We encourage suppliers and contractors to adopt responsible business policies and practices for mutual benefit.

All prospective suppliers who express an interest in providing any services to Anvil are required to meet our Vendor due diligence process before acceptance as a suitable provider of services.

To further underpin this requirement, Anvil approved providers are reviewed on an annual basis and requested to update their documentation. They will be sure that Anvil employees will not compromise the reputation of a

supplier or partner as a result of unethical conduct and they will be clear about our expectations of them as a partner or supplier to the group and our zero tolerance policy in terms of unethical transactions or behaviour.

Non-compliance or failure to provide evidence of the appropriate documentation can result in the sub-contractor being removed from our system and any future or potential tasks with this provider will be cancelled. The system continues to evolve and be updated to ensure compliance.

The Anvil Vendor Management System provides Anvil's Operations team a 'review and scoring' feature which is undertaken following each assignment including any feedback from the client, so we are able to grade our suppliers on their performance using a five star rating system. Any points raised are discussed with the provider to reinforce the service and ensure they are up hold our principles in regards to Human Rights. As this is a live database, this ensures both the consistency of service and an effective tool to identify non-compliance. The system also offers a 'review and scoring' feature, which is undertaken following each assignment, so we are able to grade our suppliers on their performance and adherence to our Terms and Conditions.

3.0 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 force and compulsory labour;
- Principle 5:** The effective abolition of child labour; and
- Principle 6:** The elimination of discrimination in respect of employment and occupation.

The following details our adherence to the above principles:

Commitment

As an internationally renowned and accredited security consultancy with particular strengths in Travel Risk Management and Crisis Avoidance Services, Anvil routinely support client operations across six continents. Anvil plays an important role in society. We make a difference by helping people to operate in a safe and secure environment where they can thrive and prosper. Our size and scale mean that we touch the lives of millions of people across the world and our goal is to ensure that we make a positive impact on the communities in which we work. In this report we feature the important work carried out by our colleagues that makes us proud to be securing your world.

Anvil 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. Anvil does not force labour. Anvil recognises right of collective bargaining and upholds Freedom of Association.

Initiatives

Anvil has the following policies associated with Labour:

1. Equal Opportunity Policy
2. Human Rights
3. Health & Safety Policy
4. Suppliers Code of Conduct
5. Flexible working policy

These policies clearly highlight the fact that Anvil 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").

Anvil has strict Health & Safety Policies which support a range of safety procedures. Risk assessments are reviewed annually; we run carry our regular safety compliance audits of all sites.

Anvil 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. Anvil retains information in line with Data Protection requirements on issues/grievances with regards to all its policies. This is extant across the Group and extends to our service providers through Anvil's approval system. This outlines the standards to which we want them to adhere. Anvil believes that this is particularly important due to the areas of the World in which our service providers routinely operate; such remote regions of the World are often characterised by Child Labour and other such associated criminalities. Anvil therefore ensures that it is not collaborating with any organisation that supports Child Labour.

Anvil has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Compact Labour principles. In addition we have not been the subject of any health and safety statutory notices or prosecutions in the last year.

Anvil reviews all policies and internal systems associated with this section annually at a minimum. Anvil staff have a minimum of one appraisal per annum to discuss any relevant issues. Anvil recognises the importance of being proactive in this department and this approach will continue into 2016.

4.0 ENVIRONMENT

Principle 7: Business should support a precautionary approach to environmental changes;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Anvil recognises the importance of the above principles and makes every effort to exceed in our contribution to protecting the environment.

Anvil is committed to excellence in all aspects of its business. This includes environmental protection, which is considered an integral part of our operations. Anvil regards Government legislation and our Company policy as minimum standards, which should be improved upon wherever it is reasonable to do so.

We recognise that environmental protection is essential to the wellbeing of staff, the local populace and the natural habitat of wildlife and will do our best to protect them. We also recognise that our day-to-day operations impact on the environment in a number of ways and wish to minimise the potential harmful effects of such actions wherever and whenever practicable.

We will endeavour to ensure that the company's activities are safe for employees, subcontractors, clients and others who are, in any way, involved in our work. We accept that we have a duty of care as producers of waste to ensure that waste is minimised in all parts of our business and that those acting on behalf of the Company for waste disposal are competent to do so, discharge their own duties correctly and are able to prove this by means of the appropriate documentation and checks.

We have adopted a policy to ensure that we recycle waste whenever it is reasonable to do so. We encourage our suppliers and customers to adopt the best possible environmental practices and will communicate our policy as appropriate to customers and suppliers.

In adopting this policy, Anvil commits to the provision of the requisite resources, priorities and training to fulfil its obligations. In commending this policy to employees, customers and suppliers, the Company seeks to encourage a full sense of shared responsibility for the protection of the environment.

On this basis Anvil is committed to the protection of the local environment and to achieving environmental best practice throughout its business activities by:

- Identifying those activities undertaken by Anvil that may have a direct impact on the environment;
- Working towards reducing any significant impact to the environment as a direct consequence of the identified activities;
- Ensuring the identified activities are safe for employees, sub-contractors, clients, suppliers and others who come into contact with our work;
- Recognising and accepting a responsibility for contributing to the protection of the global environment and being committed to the principal of sustainable development;
- Monitoring purchasing practices and internal operations, including energy and transport to ensure best use of natural resources and minimum environmental impact;
- Whenever possible, reducing the environmental impact of goods and services supplied by adopting a "cradle to grave" assessment and responsibility for them;
- Minimising the waste produced in all parts of our business;
- Monitoring and working with our suppliers and other third parties associated with our business and setting them similar high standards;

- Seeking to integrate environmental considerations into future business policy decisions;
- Ensuring associates understand and are accountable to these policy goals through communication and training;
- Communicating the policy as appropriate to customers and suppliers;
- Developing systems to implement and review this policy;
- Complying with relevant environmental legislation, and working to improve effectiveness of our environmental management, in line with EN ISO 14001;
- Using energy efficiently throughout our operations and supporting the efficient use of electricity.
- Re-using and recycling wherever possible.

Finally, Anvil will, wherever possible, advise and inform its clients, contractors and suppliers on any potential sustainable development procedures that they may be in a position to adopt.

5.0 ANTI-CORRUPTION

Anvil's adherence to the UN's 10th Principle of the Global compact has been detailed as follows:

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

This principle is core to how we run our business.

Commitment

Anvil is compliant with the Bribery Act and does not participate in any corruption, bribery or extortion. Anvil supports the UN Convention against Corruption and does not operate with organisations that are corrupt. Integrity is one of the group's core values – being a responsible business partner, employer, customer and supplier is an important part of our strategy and forms an essential foundation on which we carry out our business. In our view, ethical behaviour of corporations should not be just a reaction to regulation or legal compliance, but a means of doing business that gives customers, employees, partners and communities the confidence that they are working with an ethical organisation that is not prepared to compromise on its integrity to achieve its objectives or to make money.

Initiatives

Anvil requires compliance with the highest ethical standards and all anti bribery and corruption laws applicable to it in the conduct of our business. We value integrity and transparency and have a zero tolerance for corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of Anvil. In order to ensure that everyone in the group understands their obligations in relation to this policy, we:

- Update and strengthen the Anvil Anti-bribery and Values and standards policies periodically, incorporating evolving legislation and evaluating any risk to the group's integrity as the business grows;
- Ensure that all employees are aware of their obligations under the policy, through various communications channels including e-learning, new hire process and periodic internal;

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- Reinforce the importance of ethical behaviour through induction, employment contracts, staff handbooks, training;
 - Relevant vetting of our suppliers to ensure alignment with our own commitments; and
 - Employment of a Whistle blowing policy, process and systems.

Outcomes

As a result of our adherence to the 10th principle:

- 100% of our employees are informed about our anti-corruption policies with regard to gifts as outlined in our Employee Handbook and Anvil's own internal eLearning course as part of the new hire on boarding process;
- Internally, we have a documented check and balance procedure for all transactions which is controlled by finance and HR;
- Anvil submits audited accounts each year to Companies House which are verified by external auditors which is used as one of the methods of identifying any spurious payments which could be related to bribery or corrupt behaviour;
- Anvil has not been involved in any legal cases, rulings or other events related to corruption or bribery; and
- Embed improved risk management processes across the group including a governance, risk and compliance system.