



NetDimensions

NetDimensions'
UNGC Communication on
Progress (COP) 2017

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1. Managing Director's Statement

NetDimensions was acquired by Learning Technologies Group (LTG) early in the year. The changes this brought about in our structure and processes demanded a lot of time from management and staff; therefore, we fell short of some of the goals originally set for the company. CSR continues to be of great importance to NetDimensions and LTG has a stated commitment to social responsibility. The committee is again looking at ways in which we can continue to work towards supporting the UNGC's Ten Principles.

During 2017, we organized and participated in several CSR events and initiatives with the aim of propagating sustainable and responsible business practices both within our organization and our value chain.

Moving into 2018, we shall continue to commit to the Ten Principles, develop our companywide CSR practices and build towards a better and more sustainable society and business environment.

We thank our employees and partners once more for their continuing support to our CSR efforts and look forward to our successful continuation of this exciting and important journey.

Sincerely yours,



Mr. Peter Gordon
Managing Director



2. About NetDimensions

NetDimensions is a global provider of learning, knowledge and performance management solutions for Highly Regulated Industries, where operational and compliance requirements are particularly complex.

NetDimensions provides companies, government agencies and other organizations with talent management solutions to personalize learning, share knowledge, enhance performance, and manage compliance programs for employees, customers, partners, and suppliers.

Through our offices worldwide, as well as through a global reseller network that extends to over 40 countries, NetDimensions serves over 400 clients with more than 4.4 million active users.

Since March 2017 NetDimensions has become a wholly owned subsidiary of Learning Technologies Group plc (LTG) which is listed on the London AIM market.

Post the acquisition of NetDimensions by LTG, the company went through an 'integration' process so that going forward certain common functions could be provided by the parent company. These are HR, Finance, Facilities and Marketing. NetDimensions remains a standalone company within LTG, with its own leadership team, but now benefits from the expertise and professionalism of having these core functions provided by central specialists. This change has been disruptive to some of our 2017 CSR objectives.

LTG's position on corporate responsibility, employee development, inclusion and diversity, social and environmental responsibility is set out on page 12 of the Annual Report of the Directors

(https://ltgplc.com/wp-content/uploads/2017/04/LTG_Report_2016.pdf).

3. Executive Summary

Similar to last year, we kicked off our CSR efforts for 2017 with the Walk for Millions Walkathon in Hong Kong. We had 18 participants whom together raised around US\$1,100, to which another US\$1,100 was added by NetDimensions, yielding nearly US\$2,200 in aggregate to charities in Hong Kong.

We then organized a food drive in Hong Kong, the Philippines and in EMEA. We collected almost 130 kg of food items in Hong Kong, while our colleagues in EMEA donated over £220 in cash plus more than 140 food items to food banks, and the Philippines donated US\$200 of food items to the kids in Brgy, Culiat Quezon City.

On February 25th, NetDimensions sponsored the Days for Girls Healthy Food and Hygiene Drive in Culiat, Quezon City, Philippines. Together with members of Days for Girls (Manila Chapter), five of our employees spent a morning with around 40 children ages 4-8 from families that live below the poverty line, and taught them about the importance of schooling, personal hygiene and eating healthy food.

In March, we donated around US\$270 to the UNICEF. UNICEF is a leading humanitarian and development agency working globally for the rights of every child. Child rights begin with safe shelter, nutrition, protection from disaster and conflict and traverse the life cycle: pre-natal care for healthy births, clean water and sanitation, health care and education.

In April, we organized an eyeglasses recycling program in partnership with the Hong Kong Polytechnic University. 7 pairs of eyeglasses were donated to benefit people who cannot afford new eyeglasses.

In May, NetDimensions committed around US\$1,800 to sponsor the Heep Hong Society of Hong Kong once again to organize a full day activity for children with Autism Spectrum Disorder (ASD), Attention Deficit/Hyperactivity Disorder (ADHD), specific learning difficulties, and other special needs. We co-hosted a Lantau Island / Tai O / Sky 100 Day Trip with the kids and their families.

We continued to collaborate with the Hong Kong Rugby Union Community Foundation – the Astig Pinay Exiles Rugby Team, a newly established rugby team composed of (currently) sixteen domestic helpers in Hong Kong. Our sponsorship enabled the team to purchase rugby kit and gear, and go through formal rugby coaching training. Every Sunday, they meet at Happy Valley or the South Island School to learn and practice. According to Amnesty International, domestic helpers in Hong Kong are often at risk of serious human and labor rights violations. In addition, integration of foreign domestic helpers in Hong Kong with other local communities is

almost non-existent. This initiative is looking to enhance integration of domestic helpers into Hong Kong's society.

In October, we once again organized voluntary staff blood donations at our Hong Kong office, with 4 donating participants in total. Blood donor organizations globally highlighted an almost 30% drop in the number of people donating blood globally compared to a decade ago. NetDimensions once more wanted to emphasize the tremendous importance of the donation of blood and by doing so saving people's lives.

In December, we joined the Heep Hong Society of Hong Kong in a half day activity for children with specific learning difficulties and other special needs. The event was hosted at the Wan Tsui Centre, an early education and special child care centre in Chai Wan. About 12 children and 10 NetDimensions volunteers took part in an event that is part of the school's social adaptation programme, which is designed to improve the adaptability and active participation of the students in different community activities. Emphasis is put on enriching the children's sensory experience and improving the required cognitive, social and communication skills. NetDimensions donated HK\$10,000 to Heep Hong Society, part of which will help cover the costs of this programme.

We are also happy to join the partnership fund with Heep Hong Society from December. Partnership fund is operated by the Social Welfare Department. This is tripartite partnership among the welfare sector, the business community and the Government to help the disadvantaged. The Partnership Fund for the Disadvantaged provides matching grants for applicant welfare NGOs in accordance with the contribution from business corporations in cash and on a dollar-to-dollar basis. I.e. If we donate 10,000, Partnership Fund will grant an additional \$10,000.

Throughout the year, we continued to work with, and support LINGOs and again saw them increasing the use of the NetDimensions-donated NetDimensions Talent Suite Learning Management System substantially. LINGOs now has a total of 88 of their member NGOs (and approximately 24,000 active users) working with our NTS system.

The following sections summarize NetDimensions' engagement with the United Nations Global Compact in 2017 in more detail. They also reflect on CSR goals we had set in 2016 for 2017 and set new goals under the Ten Principles for NetDimensions to strive for in 2018. NetDimensions will continue to communicate on progress under the United Nations Global Compact, and aims to continuously improve its business practices and environment in line with the Global Compact.

4. Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: Business should make sure that they are not complicit in human rights abuses

4.1 Introduction

Respect and support of Human Rights continue to be key to our philosophy on how we do business and treat our employees, partners and counterparts. Over the course of 2017 we took a number of steps to promote the UNGC principles related to Human Rights in our business and value chain. Below is a summary of our achievements in this area and of how we lived up to the measurements we had set ourselves for the year in our COP 2017. We will also set new goals for 2018 to continue our efforts to enhance, respect and/or improve human right in our company and business environment.

4.2 Achievements

[4.2.1 Walk for Millions – the Community Chest of Hong Kong](#)

Similar to last year, we kicked off our CSR efforts for 2017 with the Walk for Millions Walkathon in Hong Kong. We had 18 participants whom together raised around US\$1,100, to which another US\$1,100 was added by NetDimensions, yielding nearly US\$2,200 in aggregate to charities in Hong Kong.



The Community Chest of Hong Kong is an independent, Hong Kong-based non-profit organization. As one of the most important charities in Hong Kong, The Community Chest serves as an umbrella organization to provide grants to a wide range of charities and community projects, especially in relation to elderly services, family and child welfare services, medical and health services, community development services and the environment.

4.2.2 Food Drive

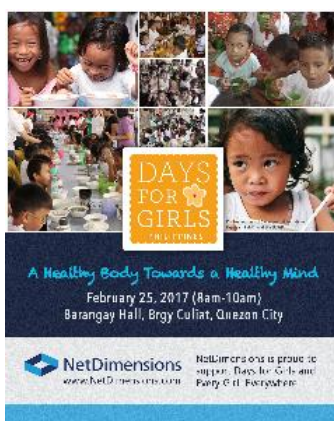
In February, NetDimensions staff in the APAC and EMEA regions participated in food drives.

In Hong Kong, office staff donated 129.3 kg (206 items) of food (that's equivalent to 308 meals) to Feeding Hong Kong, who redistributes the food items to partner charities, all of whom are registered non-profit organizations working with underprivileged individuals in Hong Kong. Though often seen as a rich city, a shocking 1.5 million people in Hong Kong are chronically hungry.



Our home-based staff contributed to their own 'virtual food drive' by donating to local organizations using our donation guide. donated a fantastic £220 plus 147 individual items of food such as tinned goods, pasta, toilet paper & sleeping bags.

4.2.3 Days for Girls Healthy Food and Hygiene Drive



On February 25th, NetDimensions sponsored the Days for Girls Healthy Food and Hygiene Drive in Culiati, Quezon City, Philippines. Together with members of Days for Girls (Manila Chapter), five of our employees spent a morning with around 40 children ages 4-8 from families that live below the poverty line, and taught them about the importance of schooling, personal hygiene and eating healthy food.

The event started off with nursery rhymes, storytelling, and discussions, followed by songs and a video presentation on personal hygiene and nutrition, then ended with organized games. After the games, all children received a gift (stationery for school use) and had a healthy and nutritious lunch together.



4.2.4 Heep Hong Society



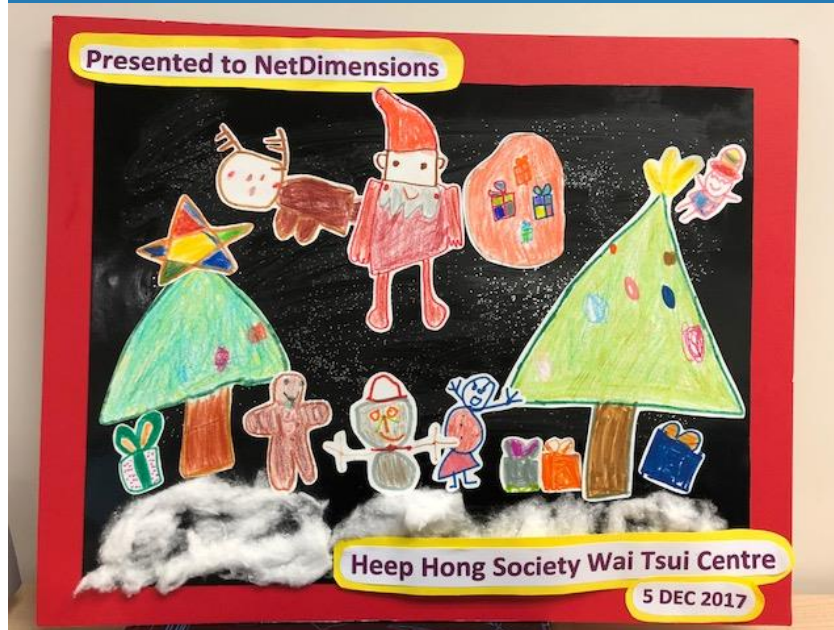
協康會
Heep Hong Society

In May, NetDimensions sponsored a day trip for the the Heep Hong Society of Hong Kong. The Heep Hong Society provides support for children with Autism Spectrum Disorder (ASD), Attention Deficit/Hyperactivity Disorder (ADHD), specific learning difficulties, and other special needs.

The children and their families visited the Tian Tan Buddha and shrine, had lunch at the Po Lin monastery, visited a local fishing village and the Sky 100 observation deck at the International Commerce Center.



In December, we donated HK\$10,000 to Heep Hong Society Social Adaptation Programme and joined in a half day activity for children with specific learning difficulties and other special needs. We played games and tea time together.





4.2.5 Blood Drive

4 employees from NetDimensions' Hong Kong office voluntarily donated blood to local blood banks in December 2017 in their support and respect of human rights and health. We believe blood donations are very important because blood is a unique fluid required for people to live that cannot be made other than by a human body itself, hence can only be obtained through donations, and can save people's lives.





4.2.6 Astig Pinay

In 2013, there were 320,000 foreign domestic helpers in Hong Kong. 48% were from the Philippines, 49.4% from Indonesia. According to Amnesty International, domestic helpers in Hong Kong are often at risk of serious human and labor rights violations. This initiative is looking to enhance integration of domestic helpers into Hong Kong's society.

The NetDimensions sponsored touch rugby team has continued to grow since its start in March, 2016, and now has over 20 active members with more women joining every week. Every Sunday, they meet at Happy Valley or the South Island School to learn and practice. Our sponsorship enabled the team to purchase rugby kit and gear, and go through formal rugby coaching training.

The team has also had the opportunity to learn from guest coaches like Chris Garvey, an experienced women's rugby coach for the Hong Kong women's team and Valley's premiership-winning side, and Adrienne Garvey, a Hong Kong women's rugby player. They were also recently featured on the local online sports news publication, More Chaos (<https://www.morechaos.com/single-post/2017/10/22/A-sporting-tribute-to-the-domestic-helper>).

This year one of the team members, Khaz Brizuela, was able to attend a non-contact coaching course at the Elite Rugby Training Center in Kowloon Tong. Here's what she had to say about her time on the rugby team:

"I still can't imagine how far me and my team and this sport has changed our life in so many unimaginable ways. Our first rugby training session made me decide to join the Astig Pinay Exiles rugby team. We met people of different races and played with them as well. That was the first time I dived to make a try and my teammates were cheering me on. And I felt proud of myself."

As we all know, being an overseas workers is a hard, tough, risky job for all Filipinos not just in Hong Kong, but all around the world. The fact that you are away from your family and especially our kids is one of the biggest sacrifices we make. Playing rugby makes a big impact to decrease my loneliness for my 2 sons in the Philippines. My teammates have become my second family. A family away from home.

I still want to pursue coaching courses to widen my knowledge, to share it with all my fellow Filipino sports enthusiasts like me and also introduce it to my fellow Indonesian overseas workers.”



4.2.7 Fair trade Coffee

To show respect to local coffee farmers and their rights to a fair existence, NetDimensions continued to use 100% fair trade coffee in its Hong Kong and Manila offices. The coffee at our Philippines offices comes from an organization called Coffee For Peach (CFP), which started off as an Income Generating Program of a peacebuilding movement in the Philippines and now is an independent commercial business that also trains coffee farmers in the different provinces of the northern Philippines.

4.3 Measuring Goals set for 2017

#	2017 COP Goal	% Achieved	Summary
1	Organize at least 3 CSR events/efforts in relation to these principles	100%	Counting the Blood-drive, Walkathon, Heep Hong society volunteering event, Food Drive as CSR events, we organized 7 CSR events in relation to these principles last year
2	Submit the COP2016 to UNGC and remain an active participant under the UNGC	100%	We submitted our COP2017 to UNGC on 3 February 2017
3	Increase total annual CSR spending (calculated in time and budget) compared to 2016 by at least 10%	0%	The company-wide spent decreased (calculated in time and budget) during the integration of NetDimensions into LTG during 2017.
4	Maintain the use of fair trade coffee beans in NetDimensions' global coffee bean consumption as a percentage of all coffee beans used above 95%.	100%	Percentage of fair trade coffee beans out of the total consumed worldwide grew from 98.9% in 2016 to 100% in 2017.

4.4 Setting goals for 2018

We target to achieve the following in 2018 in relation to UNGC's Principles in relation to Human Rights:

1. Organize and/or sponsor at least 3 CSR events/efforts in relation to these principles;
2. Submit the COP2018 to UNGC and remain an active participant under the UNGC;
3. Measure our total annual CSR spending (calculated in time and budget);
4. Maintain the use of fair trade coffee beans in NetDimensions' global coffee bean consumption as a percentage of all coffee beans used above 95%. We will also investigate the possibility to extend the use of fair trade to other products such as tea.

5. Labor

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 labor

Principle 5: The effective abolition of child labor

Principle 6: The elimination of discrimination in respect of employment and occupation

5.1 Introduction

We support the Principles above and believe that labor conditions should be fair and respectful towards employees' rights and status as free individuals. NetDimensions will not tolerate or accept any forced, compulsory and/or child labor within its company and value chain. Below is an overview of our 2017 efforts in relation to the UNGC Labor-related Principles and related goals we had set for the year.

5.2 Achievements

5.2.1 LINGOs/Humentum

Throughout the year, we continued to work with, and support LINGOs and again saw them increasing the use of the NetDimensions-donated NetDimensions Talent Suite Learning Management System substantially. LINGOs now has a total of 88 of their member NGOs (and approximately 24,000 active users) working with our NTS system.

In July of this year, LINGOs merged with InsideNGO and Mango to form Humentum; under this name they are now offering Humentum Learning Services to their community. The new organization serves development, humanitarian, civil society, and other international social sector organizations.

As communicated in our 2013 COP, NetDimensions committed to providing its proprietary developed learning platform NetDimensions Talent Suite free of charge to NGO LINGOs (Humentum) and the Last Mile Learning initiative which makes world-class courses and learning opportunities available online at no cost in areas such as basic finance, basic management, project management and other development-specific topics. These courses are delivered to users via the NetDimensions Learning Management System and accessed through either the Global Last Mile Learning

portal or national portals run by local associations and training providers. All content on the platform are available in various online formats as well as in packages of facilitation and participant materials for face-to-face instruction. All materials are available in a variety of languages. The core learning paths of Last Mile Learning can be used to develop key management.

[5.2.2. Enhancement data protection documentation](#)

Partly in preparation of the EU General Data Protection Regulation which will become active on 25 May 2018, we substantially increased our internal data protection policy and training framework during 2017 in, *inter alia*, the area of human resources.

[5.2.3. Modern Slavery Statement](#)

NetDimensions' parent company, LTG, has published a Modern Slavery Statement putting in place systems to comply with the Modern Slavery Act 2015. The statement sets out the steps taken to ensure that slavery and human trafficking are not taking place in our supply chain. This along with our Business Ethics, Anti-Corruption and Anti-Bribery Policy emphasize our desire to do business ethically and responsibly.

5.3 Measuring Goals set for 2017

#	2017 COP Goal	% Achieved	Summary
1	With regards to LINGOs (Humentum): a total of 90 NGOs having implemented/started using the system with a total of 24,000 active users on the NetDimensions provided NTS platform	99%	By the end of 2017, 88 LINGOs member NGOs started using the system and a total of 24,000 active Users used the system
2	Continue to monitor the 20 CSR KPIs identified	50%	Since the integration of NetDimensions into LTG, Legal & HR have become centralised function so it is no longer possible to track certain metrics.
3	Improve 2017 staff sickness absenteeism company-wide compared to 2016	0%	Since the integration into LTG, the NetDimensions HR department has been reorganised and centralised.

			There is no reliable sickness/absenteeism data for 2017 although this should be available in 2018.
4	Improve the 2017 'regretted attrition; KPI compared to 2016	0%	There has been material employee turnover during the integration into LTG and reliable data to analyse regretted attrition is not available for 2017.
5	Have zero office and work related accidents (RSI included)	100%	We had no accident or RSI incidents staff members during 2017.
6	Perform staff completing engagement satisfactory survey and improve related overall 2017 score compared to 2016	0%	No survey was conducted during the integration process. In January 2018 a survey has been conducted in association with companywide staff focus groups, which should form the baseline for future improvements.

5.4 Setting goals for 2018

We target to achieve the following in 2018 in relation to UNGC's Principles in relation to Labor:

1. With regards to LINGOs/Humentum: a total of 95 NGOs having implemented/started using the system with a total of 26,500 active users on the NetDimensions provided NTS platform;
2. Continue to monitor the CSR KPIs
3. Measure staff sickness absenteeism company-wide
4. Have zero office and work related accidents (RSI included)
5. Conduct a staff attitudes survey and make a set of recommendations based on the feedback;

6. Environment

Principle 7: Business should support a precautionary approach to environmental challenges

Principle 8: Undertake initiatives to promote greater environmental responsibility

Principle 9: Encourage the development and use of environmentally friendly technologies

6.1 Introduction

NetDimensions is determined to reduce its carbon footprint and add its weight in preserving the earth's environment and livability for next generations. Whilst NetDimensions is involved in software development, marketing and sales, hence active in a low carbon exhausting industry, NetDimensions recognizes that it can nevertheless act responsibly and make a difference in relation to reducing carbon footprint. Below is a summary of our 2017 achievement related to the UNGC Principles surrounding Environments and our related goals for 2018.

6.2 Achievements

Supplier and Partner Code of Conduct

We continued to communicate our Supplier and Partner Code of Conduct to our partners and suppliers. The Supplier and Partner Code of Conduct clearly articulates NetDimensions' views on CSR and its support of the Ten Principles under the UNGC. Whilst the code is not binding to those parties it has been communicated to, it does send out a very clear message on the values NetDimensions thinks are critical in doing business. NetDimensions included a copy of the code in a number of its new supplier and business partner contracts. Over the course of the year, an approximate total of 5 partner and supplier organizations have received and read a copy of the code.



Supplier and Partner Code of Conduct

At NetDimensions, we believe that Corporate Social Responsibility (CSR) and Corporate Citizenship are at the heart of all great organizations – it's something that we are committed to as a responsible business. We aim to influence our suppliers and business partners to respect the Universal Declaration of Human Rights and dedicate to Environmental Protection.

We implemented this Code of Conduct for Suppliers and Partners in our business practises and strongly encourage our suppliers and business partners to – like us – adopt the following principles in the way they work.

BUSINESS CONDUCT

CSR refers to the responsibility of an organization for the impacts of its decisions and activities on society and the environment, through transparent and ethical behaviour. It is vital for a sustainable and fruitful relationship with all our stakeholders. We expect our suppliers and business partners to:

- Act with integrity, constantly striving to uphold the highest standards of ethical practice.
- Contribute to sustainable development, including health and welfare of society.
- Adhere to all applicable laws and consistent with international norms of behaviour.
- Integrate this code of conduct throughout the organization and practice in its relationships.

LABOUR PRACTICES AND HUMAN RIGHTS

Our policies are underpinned by a respect for inherent dignity and inalienable rights of each individual. We expect our suppliers and business partners to:

- Provide a safe working environment and support the occupational health of employees.
- Never complicit in human rights abuses.
- Encourage employees to report human rights abuses and ensure no workplace revenge.
- Treat employees fairly and do not discriminate on the basis of differences such as age, race, ethnic background, religion, gender, sexual orientation, disability or status as a parent or carer.
- Work against corruption in all its forms, including extortion and bribery.

ENVIRONMENT

Environmental considerations are an integral part of our business practices. We are committed to operating with due care for the environment (the precautionary principle) and we expect our suppliers and partners to:

- Take practical steps to make sure they do not unnecessarily impact the environment in the way they produce, consume and dispose of materials.
- Encourage the development and diffusion of environmentally friendly technologies.
- Undertake initiatives to promote greater environmental responsibility.

UNITED NATIONS GLOBAL COMPACT

NetDimensions is proud to be a signatory to the United Nations Global Compact, a policy initiative that works towards the vision of a more sustainable and inclusive global economy.



The Compact's ten universally accepted principles resonate highly with NetDimensions' Values, which define our company's culture and our commitment to maintain the highest ethical standards. Suppliers are highly encouraged to integrate the ten principles in their decision-making process.

6.3 Measuring Goals set for 2017

#	2017 COP Goal	% Achieved	Summary
1	Continue implementing the Supplier and Partner Code of Business to as many partners and suppliers as possible	100%	We continued implementing the Supplier and Partner Code of Business to new partners and suppliers and communicated the code to around 15 companies in 2017
2	Reduce our companywide air travel as calculated on a per employee basis compared to 2016	0%	We did not record the figures due to the integration into LTG.
3	Reduce our companywide kilowatt usage as calculated on a per employee basis compared to 2016	100%	We have reduced the usage by 9.4% in 2017.
4	Reduce our companywide paper usage as calculated on a per employee basis compared to 2016	100%	We have reduced the usage by 13.96% in 2017.
5	Organize at least one CSR event in relation to this principle	100%	We participated in eyeglasses recycling program in Hong Kong.

6.4 Setting goals for 2018

We target to achieve the following in 2018 regarding to UNGC's Principles in relation to Environment:

1. Continue implementing the Supplier and Partner Code of Business to as many partners and suppliers as possible;
2. Monitor our companywide air travel as calculated on a per employee basis;
3. Reduce our companywide kilowatt usage as calculated on a per employee basis compared to 2017;
4. Reduce our companywide paper usage as calculated on a per employee basis compared to 2017;

7. Anti-Corruption

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

7.1 Introduction

NetDimensions believes corruption and bribery to be a major challenge in international business and is in full support of this Principle under the UNGC. In recognition of this principle we continue to train and educate our staff and partners on how to recognize bribery and corruption and how to report any suspected bribery or corruption.

7.2 Achievements

7.2.1 Training and Compliance

During 2017, NetDimensions continued to communicate its Supplier and Partner Code of Conduct in its value chain and (re-)educated its global staff in anti-corruption and anti-bribery through our internal NetDimensions Talent Suite instance. In addition we updated our internal Code of Conduct and Business Ethics.

7.2.2 EcoVadis

NetDimensions was awarded its second Silver CSR rating by EcoVadis in December 2016, a global CSR assessment company providing supplier sustainability ratings for global supply chains, meaning that we again scored comfortably in the top 30% of companies evaluated by EcoVadis. This as well provides an objective demonstration of NetDimensions' substantial and change-making CSR efforts and we hope to continue making progress in this regard. The assessment result of 2017 has not been released yet.

7.3 Measuring Goals set for 2017

#	2017 COP Goal	% Achieved	Summary
1	Have 100% of our front-line staff completing the anti-corruption and anti-bribery compliance acknowledgment statements at least once	0%	We can't get this number for 2017 given the acquisition but will start monitoring this from 2018, now that compliance has been centralised in LTG.
2	Make our Code on Business Conduct, Ethics and CSR awareness available to 100% of our newly onboarding frontline staff	100%	This is a part of the onboarding process for all employees joining the company.
3	Assign either our course on Business Conduct, Ethics and CSR awareness or our Anti-Bribery and Anti-Corruption course (including exam questions) to 100% of our staff	0%	We did not record this due to the integration into LTG.
4	Continue implementing the Supplier and Partner Code of Business to as many partners and suppliers as possible	100%	We continued implementing the Supplier and Partner Code of Business to new partners and suppliers and communicated the code to around 15 companies in 2017

7.4 Setting goals for 2018

We target to achieve the following in 2018 regarding to UNGC's Principles in relation to Anti-Corruption:

1. Have 100% of our front-line staff completing the anti-corruption and anti-bribery compliance acknowledgment statements at least once;
2. Make our Code on Business Conduct, Ethics and CSR awareness subject to 100% of our newly onboarding frontline staff;
3. Assign *either* our course on Business Conduct, Ethics and CSR awareness *or* our Anti-Bribery and Anti-Corruption course (including exam questions) to 100% of our staff;
4. Continue implementing the Supplier and Partner Code of Business to as many partners and suppliers as.