

SKA INTERNATIONAL GROUP'S GLOBAL COMPACT COP 2017/8

Participant	SKA International Group
Time Period	September 2016 – March 2018
Format	Stand Alone Document
Contents	<ul style="list-style-type: none">- CEO Statement of continued support for the UN Global Compact and its ten principles- Description of actions of relevant policies related to Human Rights- Description of actions of relevant policies related to Labour- Description of actions of relevant policies related to Environment- Description of actions of relevant policies related to Anti-Corruption- Measurement of Outcomes

CEO Statement of continued support for the UN Global Compact and its ten principles

Sent under separate attachment

Description of actions of relevant policies related to Human Rights

Assessment, Policy & Goals

At SKA we endeavor to ensure that we do not infringe on human rights, that we comply with all the policies of the UN related to human rights and act within the laws of the countries in which we operate. Our workplace practices and policies are based upon providing fair compensation, equal opportunity, safe and healthy workplaces.

Our other commitments to human rights reflect our belief that the success of our company is linked with employee satisfaction and well-being. We foster compliance with these policies on a continuing basis through internal and external training programs and assessments. Yearly evaluations are conducted to ensure employees can raise their concerns and appropriate corrective actions are implemented and monitored.

SKA acknowledges and respects the principles contained in the United Nation's Universal Declaration of Human Rights and proactively actions these with each of the following groups:

Employees

SKA seeks to respect the human rights of all employees within the company as well as complying with all national laws. Our commitment is manifested in policies such as the Human Trafficking Policy and the Sexual Harassment Policy. To ensure remediation of potential abuses, we have a complaint procedure which is applicable to the whole organization. Any employee with concerns regarding the human rights impacts of SKA's activities may raise these through the internal complaint process or directly inform the HR Manager or the SVP/Director HR & Administration. We continue to raise the bar in step with the ever improving national legal framework within the UAE.

Suppliers and Business Partners

SKA works with suppliers and business partners to ensure that human rights are respected in the supply chain, based on our business relationships, leverage and operational context. We impose a rigorous Supplier Assessment Process which has been revised and improved this year. Our engagement is manifested through our commitment towards the employment and progress of the local workforce in the countries we have our operations in. As appropriate, we use tools for human rights risk and impacts assessments to identify actual and potential human rights issues. Actions to manage and address human rights risks and impacts are guided and carried out through dialogue and collaboration with relevant stakeholders. Where appropriate, SKA also aims to use its influence to support the advancement of human rights in the communities where we operate.

Customers

SKA seeks to respect the human rights of our customers in all operating countries. Our main focus areas include: respecting the privacy of our customers e.g. by safe storing of any personal data, as described in our Privacy Policy; and aiming for that no customers are discriminated against, as outlined in our Discrimination and Equality Policy, HR Handbook.

Implementations

SKA strives to provide a safe and healthy working environment for all its employees. Our workplace policies and practices include commitments on:

Child Labor: SKA does not recruit child labor and condemns all forms of exploitation of children.

Ethical Recruitment: SKA implements a “no fees” recruitment policy. We do not ask for money or charge fees to the applicant as part of the application process.

Forced Labor and Human Trafficking: SKA supports the elimination of all forms of forced, bonded or compulsory labor and provides associate training on human trafficking awareness and prevention.

Harassment and Non-Discrimination: SKA supports and upholds the elimination of discriminatory practices with respect to all aspects of employment, and promotes and embraces diversity and inclusion within its business operations.

Measurement of outcomes

SKA Human rights monitoring is based on principles of:

- Accuracy
- Confidentiality
- Impartiality
- Sensitivity

If any incident is being reported as a human rights violation, further investigation and reporting are done within 24 hours. Of course, different sorts of violations should produce appropriate responses, depending upon the mandate of the monitoring operation. For example, particularly serious violations such as arbitrary killings, torture and large scale forced evictions ordinarily deserve particular attention and rapid

follow-up, hence SKA ensures every site has a designated HR Representative who reports any incidents to the HR Manager & SVP / Director HR & Admin in the HQ.

Description of actions of relevant policies related to Labour

Assessment, Policy and Goals

SKA continually reviews and updates its own Employee Handbook, which provides details on employee rights and resources within the organization. Employees are regularly invited to give their suggestions in the quarterly published HR Newsletter and their voice is being heard and appropriate actions taken immediately.

Our Code of Business also includes guidelines related to professional ethics, best management practices as well as other clauses that aim to protect employees and external parties in the conduct of daily operations.

The Company revisits this document on a progressive basis, to ensure that it follows the organization's growth path, reflects encountered experiences and issues and contains timely and accurate provisions or the protection of its stakeholders.

Working with new and upcoming promise talent, supporting local nationals, encouraging internship are an important new changes to develop the future team in the organization.

Implementation

SKA Human Resources department is responsible for receiving employees' issues and suggestions to improve the overall quality of the work environment, while respecting privacy.

HR will then be committed to resolve the issues until they are resolved in conformity with the country's laws and Universal Human Rights principles. Further incentive systems are looked at to encourage more proactive and reward good ideas.

SKA, in its labor contract, maintains a culture of openness, honesty and transparency. Its staff are encouraged to discuss issues encountered in the work place so as to find adequate solutions and prevent similar situations from happening in the future.

Measurement of outcomes

Indicators that were developed to monitor and evaluate to show performance;

- Increased Employee Productivity.
- Lower Absenteeism in comparison to previous years and Lower Sick Leaves
- Higher levels of engagement
- Higher retention of talent
- Increase ability to attract talent

We take pride in stating this that till date SKA has not encountered major incidents of Human Rights violation, due to its senior management frequently reassessing the Company's policies and visiting our operational sites regularly to ensure its employees are treated fairly and equally. SKA also encourages its external partners to act ethically in the work place which contributes to a healthier business environment and fewer cases of violation.

Description of actions of relevant policies related to Environment

Assessment, Policy and Goals

Following a Loss of Primary Containment at one of our subsidiary companies, the Environmental Policy Framework has been completely reviewed under the scrutiny of the BP Global Safety and Operational Risk Team. This review has now been completed, the compliance requirement set to the highest level and all new policies and procedures agreed. SKA are now confident of the highest global environmental standards.

It still remains our firm desire to qualify for ISO 14001 and OHSAS certification although the accreditation process has been delayed for financial reasons. Preparation is ongoing.

Implementation

This new policy framework has been rolled out across the SKA International Group with environmental champions in each location responsible for briefing the change and monitoring performance against the new standard.

Of note, we have installed new water treatment plants and transferred two of our expeditionary sites to mains generated electricity.

Measurement of outcomes

Through our monthly HSE audit results we have started to collect data in the following areas:

- Number and type of Spills
- Waste Oil generated
- Maintenance waste generated
- Water consumption
- Paper consumption
- Food waste generated
- Fuel Consumption
- Kilometers driven
- Electricity consumption

Each area has an annual Key Performance Target set so as to continue improving performance.

Description of actions of relevant policies related to Anti-Corruption

Assessment, Policy and Goals

SKA International Groups ABC Policy has been reviewed and improved. All staff have access via the employee handbook to the standards required and expected. The policy provides the required guidance on what to do, how to react and when to report.

Implementation

All staff have undergone an externally provided training program on ABC and we have also conducted a full review of our supply chain. We have successfully undergone the TRACE International Due Diligence Program and have full membership of TRACE International, under which we have full access to all their training material and daily reporting. A staff training program is underway which includes training packages for all staff on the following topics:

- Anti-Bribery
- Trafficked Labour
- Conflicts of Interest
- Conflict Minerals
- Economic Sanctions
- Anti-money Laundering
- Gifts and Hospitality
- Third Party Due Diligence

A compliance officer has been appointed and a senior staff member is also attending the TRACE Anti-Bribery Specialist Accreditation (TASA) Course.

Measurement of outcomes

All relevant documentation and training records are now diligently maintained both online and via paper records.