



United Nations Global Compact Communication on Progress

April 2018



CEO Statement

BROWZ has been a proud member of the United Nations Global Compact initiative since 2013.

We acknowledge and accept our role as a corporation and embrace the 10 principles of the United Nations Global Compact; human rights, labour standards, environment and anti-corruption. We embed these within our business offerings and our business culture.

BROWZ has expanded its role as a supply chain risk specialist. We have developed and implemented risk, compliance and pre-qualification programmes to some of the largest global brands. We operate using a network of global offices in the United States, Australia, Canada, Germany and the United Kingdom.

We operate within 35 industry verticals. Our clients entrust their supply chain and their high-risk suppliers to our risk mitigation programmes, this allows us to not only collect supplier information, we also analyse and maintain content using a wide network of subject matter experts. Our client base is starting to expand their own due diligence which includes issues such as sustainability, ethical sourcing and business transparency and we are very proud that we are part of this area of supply chain development.

We endeavour to demonstrate and encourage our clients and potential clients to adopt these principles into their business using our business products.

In our 2018 statement, we are just as committed to this being an ongoing part of our business philosophy and corporate culture. We actively encourage employee 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

A handwritten signature in black ink that reads "Elaine Beitler". The signature is fluid and cursive.

Elaine Beitler
CEO BROWZ LLC
April 2018

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Introduction

BROWZ works with global brands, operating within 35 different industry verticals. We use a network of 7 offices in various strategic locations globally. Our product offerings are subject to continual analysis and upgrade and are developed in conjunction with our clients to provide configurable solutions to the changing face of supply chain risk and protection of company brand equity.

We collect, maintain and analyse supply chain risk information using our bespoke software that is subject to strict governmental controls and copyright protection due to its unique nature.

We provide expert analysis and monitoring services against our product offerings that have been developed using the principles of this initiative and other ethical sourcing programmes to provide our clients with the most up to date practice on sustainable procurement.

The information we generate, enables our clients to make educated and strategic decisions about their procurement practice, safe working and meet environmental best practice so they can meet and exceed stakeholder, shareholder and consumer expectations.

As a global business, we view corporate social responsibility including business transparency as a strategic requirement of our business growth and also an intrinsic element of our diverse customer product portfolio. 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.

We are committed in meeting social and ethical standards as defined within the principles of the global compact. by ensuring we treat all our employees responsibly and with dignity.

We have developed and modified our business Codes of Conduct to encourage greater vigilance in the areas of cyber criminality and to reduce our environmental footprint further. We made the strategic decision to invest in the development of a management system that allows us to control electronic security of which much of our business is based.

This has resulted in the successful implementation of ISO 27001: Information Security. This certification was awarded by a global 3rd party accreditation body. This ensures that irrelevant of the country we operate within, we will not only abide by any country specific data privacy legislation but also ensure the integrity of all personal and commercial information we retain within our programmes.

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 employees are recruited and treated in an equal manner across all our global operations, while respecting human rights not only within the business but also as we engage in business relationships with suppliers, contractors and clients.

Any of these parties can report in confidence to any member of the senior management team without fear or repercussions anything that they believe breaches human rights, improper or corrupt business practice

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

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. This is supported using an interactive computerised programme that provides all employees with guidance on all employment-based policies and practice. This is undertaken on an annual basis by all personnel.

We have addressed how employees 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 the Vice-President for global HR operation sitting on our executive board.

We recognise that our business operation is a low risk facility, but it is still essential that we provide a safe working environment to maintain the wellbeing of all members of the workforce independent of their geographical location.

Our safety committee has now been in place since 2014 and 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 assessments and workplace ergonomics. The remit of the committee now encompasses the environment and has overseen a range of “green” initiatives including the validation of an office-based recycling programme.

In 2017, we expanded the remit of the committee further 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 environmental programmes that encourage worker participation.

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, ethical sourcing 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 using an electronic media.

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, based in the United States (US), and the United Kingdom (UK).

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. In the US, our Director for Safety represents BROWZ in the National Safety Council and the Campbell Institute researching workplace safety initiatives. In 2017, our Global Head of Audit started to work with the International Institute of Safety and Risk in the UK and sits on their committee for the development of education and training to assist in the facilitation of training programmes for a safe working environment.

The National Safety Council in North America, commissioned a report analysing independent data on the effectiveness of prequalification programmes in terms of improving working conditions and workplace health and safety. They concluded that overall in the US, companies experienced a reduction in their total recordable rate (TRR) from 2007 to 2015 of 41%, yet companies registered with BROWZ experienced an even bigger reduction in TRR in the same time-period of 57%. Emphasizing the importance of using programmes to improve workplace safety and associated practice administered by a responsible business.

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 employment rights in any of the locations in which we operate, it was vital that we recognise that we employ individuals who not only live in a range of countries, we also understand that cultures and working environments can vary.

At times we can engage with 3rd parties to work on behalf of the company to supplement workload or implement new working programmes. Irrelevant of how long they spend with the business we have worked hard to make sure that we treat all individuals with the same levels of respect, dignity and make equal opportunity available to all.

We have enhanced our corporate policy statements to ensure they reflect our stance to remove discriminatory practice in the workplace. The content is subject to evaluation for suitability by all parties within the business and where available we accept constructive feedback that allows us to continually improve our performance.

This facilitates the use of country specific products that also address analysis of prevention of discrimination in the workplace.

Our global engagement process, which covers any individual independent of their employment status or location, will always provide verification of their age to ensure we are not engaging with underage labour.

We validate their identity with government issued documentation and confirm in all cases that they are working of their own free will.

We will maintain necessary copies of this documentation and the process is open to any form of independent scrutiny and verification. In some of the countries we operate, we understand that before we can make an offer of employment we must verify that an individual is 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. It is always in accordance with employment legislation in the individual 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 if selected using the services of a professional recruitment service.

We have introduced a corporate risk programme to mitigate all foreseeable workplace risk. We have tried to extend this guidance so that our workforce can employ this guidance in their everyday lives. All information regarding risk and associated hazards and suitable and sufficient control measures is formally communicated to all workers both at the time of joining the business and throughout the year via a formal communication from the company safety committee.

We also implemented an “open-door” policy that allows employees, 3rd parties or suppliers or client representatives to report a concern about business practice or activity that may impact upon their welfare or the brand equity of the business.

BROWZ will always comply 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 engagement, including a clear breakdown on remuneration, holidays and their ability to leave their 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, where our products can be used to identify potential abuses of younger workers.

As part of our product offering we actively encourage and work with our clients to collect and evaluate compliance and risk-based data on the contractors and suppliers operating within all levels of their supply chain. This not only covers direct suppliers, it also addresses sub-contractors and suppliers of indirect services.

We have developed supplier-based guidance programmes to evaluate areas of potential discriminative behaviour and actively assist in the verification of workers, their age and how they are recruited when they work for a client-based organisation.

To provide our clients with the best possible service, we ensure all members of our workforce possess the necessary competency levels to discharge their duties. We also provide detailed training programmes for all specific roles within the business. Training is ongoing and subject to continual evaluation for its effectiveness, using feedback from attendees and quality checks on their performance relative to that training. We actively encourage employees who wish to pursue additional occupational training to help them further their career and 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 potentially increasing our environmental impact including our carbon footprint. We have developed a detailed environmental policy statement that is undersigned and endorsed at the highest level within the business. This policy statement is made available to all employees and where requested any client body.

We recognise it is a continuing challenge to mitigate our environmental impact 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 (electronic) media where possible to undertake meetings and deliver presentations as required by our clients.

Where travel is unavoidable, and we cannot utilise locally based personnel, we have opted to reduce our costs by engaging with a third-party travel specialist. They are 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.

In 2017, we have seen an increased demand from our clients who wish to further increase their assessment of their supplier base by exploring other elements that can impact upon all areas of their sourcing strategy with a greater demand for programmes that assess environmental management and sustainability including recording and mapping the sourcing of materials.

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, this requires detailed levels of cultural understanding and empathy to allow us to retain our policy of zero tolerance relating to any deviance on the contents of our codes of practice and business practice.

As a business that employs workers that audit and evaluate supply chain data on behalf of our client's, it is essential that our process for managing business transparency can withstand independent scrutiny, at any stage within the programme.

All audit programmes and subsequent recruitment of audit personnel is subject to a detailed code of conduct and associated code of practice that is signed by all participants. The content is very clear on the following areas: Non-Canvassing for business; Non-disclosure of another parties' information, disclosure of any potential conflicts of interest and receipt of any gifts or incentives that could impact or influence a business decision.

We recognise the challenges that this can present and recognise that the way global business is conducted can vary widely. For example, in some countries; enforcement of national laws may be weak, gifts may be presented to assist in influencing any potential business decision. Therefore, all customer facing personnel are provided with ongoing guidance in this area and where there are any areas of concern they should be escalated to their line representative or a member of the senior management team.

Any employee or individual representing the company who fails to declare attempts have been made to pass a gift or incentive or have been approached to make decisions that do not reflect the actual event will be deemed to have breached company policy.

Our Business Transparency Policy, 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 business or individual 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. We are very proud that we are the only business operating in this sector who has achieved certification in ISO 27001: Information Security. Due to the range of data integrity laws in the countries in which we operate it was deemed necessary that we have an IT based system that can withstand the rigours of independent analysis and also demonstrate to our clients that we not only value their business but also will maintain the highest level of control over any data that has been entrusted to us.

Our IT based security policy covers the protection of both personal and commercial data. We have undertaken extensive analysis on how data laws, for example: GDPR in Europe, data disclosure in Australia can impact on the business and our products, therefore our controls are subject to continual assessment and all personnel are subject to ongoing interactive education programmes in terms of how they should protect the business and themselves when using the internet.

All policies and educational training programmes are administered and agreed by the Vice President for Information Technology and the BROWZ Information Security Team on an annual basis.

Information technology policies are covered in the following:

Email etiquette	Storing data
Internet Use & Security	Social Media Usage
Password Security	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	

All training is undertaken using interactive methods of training where upon completion the employee signs to demonstrate acceptance of the content and receives a certificate of completion.

During the entire company history, BROWZ LLC have not been involved in any investigations or incidents involving bribery, corruption or extortion.

For further information please contact:

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