



**MAXWELL
STAMP** | **PLC**

**Communication on
Progress 2018**

**Prepared for
United Nations
Global Compact**

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ABBOT'S COURT
FARRINGTON LANE
LONDON EC1R 3AX

MAXWELL STAMP PLC

TELEPHONE
020 7251 0147
FAX 020 7251 0140
EMAIL london
@maxwell
stamp.com

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To all our staff, stakeholders, consultants and supporters,

United Nations Global Compact

As you will be aware Maxwell Stamp PLC is an economics and development consultancy that has been working globally for nearly 60 years for both multinational and bilateral donors. I confirm its continued commitment to the ten principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In the annual Communication on Progress document that follows, we describe the company's actions to improve the integration of the Global Compact and its principles into its business strategy, culture and daily operations. This information can also be shared with any interested party.

Yours faithfully



Martyn J W Kebbell
Chairman

REGISTERED
NUMBER
637978
ENGLAND
REGISTERED
OFFICE AT ABOVE
ADDRESS



Contents

1.	Introduction.....	1
2.	Human Rights.....	2
3.	Labour Standards.....	5
4.	Environment.....	6
5.	Anti-Corruption.....	7
6.	Examples of Programmes Maxwell Stamp PLC (MSP) has undertaken during the Reporting Period addressing the SDGs, include:.....	8

1. Introduction

The United Nations Global Compact (UNGC) was launched in 2000 to harness the power of collective action in the promotion of responsible corporate citizenship. The Compact is a framework for businesses that are committed to aligning their operations and strategies with the ten universally accepted principles in the areas of human rights, labour, the environment and anti-corruption.

As the world's largest global corporate citizenship initiative, the Global Compact is concerned with demonstrating and building the social legitimacy of business and markets. Maxwell Stamp PLC became a signatory of the UNGC in October 2017 and joined the UK membership network in January 2018.

- i. Maxwell Stamp PLC supports and respects the protection of internationally proclaimed human rights (Principle 1);
- ii. Maxwell Stamp PLC regular monitors that we are not complicit in human rights abuses (Principle 2);
- iii. Maxwell Stamp PLC upholds the freedom of association and the effective recognition of the right to collective bargaining (Principle 3);
- iv. Maxwell Stamp PLC supports the elimination of all forms of forced and compulsory labour (Principle 4);
- v. Maxwell Stamp PLC supports the effective abolition of child labour (Principle 5);
- vi. Maxwell Stamp PLC supports the elimination of discrimination in respect of employment and occupation (Principle 6);
- vii. Maxwell Stamp PLC supports a precautionary approach to environmental challenges (Principle 7);
- viii. Maxwell Stamp PLC undertakes initiatives to promote greater environmental responsibilities (Principle 8);
- ix. Maxwell Stamp PLC encourages the development and diffusion of environmentally friendly technologies (Principle 9);
- x. Maxwell stamp PLC strongly works against corruption in all its forms, including extortion and bribery (Principle 10).

2. Human Rights

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure that they are not complicit in human rights abuses.

Maxwell Stamp PLC (MSP) and all companies in the Maxwell Stamp Group have an absolute commitment to safeguarding people and ensuring that our actions do no harm, as well as to promote and support human rights of employees, associates and beneficiaries we work with, or come into contact. As a company focussed on economic and international development objectives, this is core to our principles. Protecting and indeed enhancing the rights of people, whether through direct interventions or via the work we do to advise and support recipient governments, safeguarding and protection of human rights are central to our focus. Nevertheless, in delivering our work, we must ensure to all extents reasonable, that we do not inadvertently allow the rights or wellbeing of anyone, whether it be our staff, our partners personnel, our beneficiaries, or indeed any other member of the public, and particularly vulnerable members of the community, to be harmed in the process.

Safeguarding and protecting people's human rights crosses many policy areas within Maxwell Stamp PLC, whether this relates to discrimination, harassment, exploitation, abuse human trafficking and slavery, security, or health and safety, and span both ethical and legal boundaries.

Safeguarding people involves: policies setting expectations on behaviour and standards; proactive procedures to identify and prevent harm to (physical harm or otherwise) and the rights of others; effective monitoring and reporting systems to identify incidents; and timely and appropriate case management to intervene, and where appropriate, hold those responsible to account. Maxwell Stamp has these policies and procedures in place.

Policies to Promote Human Rights and Safeguard People

MSP has a number of core policies that cover aspects of promoting human rights and safeguarding people:

Policy	How does it Safeguard People?
Code of Ethics	Clearly sets out the expected standards of ethical behaviour for all employees and those engaged by MSP. Suppliers sign up to a separate Supplier Code of Conduct designed to cover all key policy areas related to ethical behaviour.
Anti-Trafficking and Modern Slavery Policy	Sets out our policy on ensuring as far as practical that we or our suppliers are not involved in trafficking or modern slavery.
Child Protection Policy	Sets out our policy on the protection of children with whom we may come into contact with in the course of our work, and particularly measures necessary for engaging personnel engaged in child-sensitive situations.
Counter Terrorism Policy	Sets out policy committing MSP to ensure that we do not engage or fund terrorist activities, which may ultimately harm others.
Equal Opportunities and Diversity Policy	Sets out policies for respecting and providing opportunities for people of all backgrounds and situations, and restricts any actions that may discriminate.
Data Protection Policy	Sets out our commitment to protecting the data of the individuals we engage, in compliance with legal obligations.
Due Diligence Policy	Sets out our commitment to minimum standards of due diligence, to ensure that the individuals and companies we engage are appropriately qualified, have adequate policies or systems in place, and have not been convicted of criminal acts.

Duty of Care Policy	Acknowledges MSP's responsibilities for all its employees and others under its jurisdiction.
Health and Safety Policy	Specifically geared to UK health and safety legislation, sets out the health and safety policy and requirements for MSP's employees in the UK.
Risk Management Policy	Sets out our commitment to effective risk management to minimise, monitor, and control the probability or impact of risks.
Whistleblowing Policy	Sets out our commitment to providing appropriate mechanisms to report concerns relating to ethical behaviour, procedures or illegality, and protecting whistle blowers in line with relevant legislation.

Procedures for Safeguarding People

To ensure as far as practicable that these policies are adhered to by employees and those in our supply chains, MSP has the following core approaches to ensuring that we engage the right people, they understand the standards expected, or the suppliers have adequate systems in our supply chains:

Procedure	What does it cover?
Supplier Code of Conduct	To ensure that all of our independent consultants, sub-contractors, partners and other suppliers are aware of our policies, a Supplier Code of Conduct is being finalised that encapsulates all of the relevant policies. Commitment to the standards within this document will be a compliance requirement at contract signature going forward, and failing to meet these standards a potential breach of contract where appropriate.
Employment contracts	Staff sign up to the 'Employee Handbook' when they sign contracts, binding them to the policies and procedures of the company, including the standards of ethical behaviour expected.
Supplier contracts	Supplier contracts ensure the enforceability of our standards, whereby contracts can be terminated or suspended for breach of our standards and policies.
Vetting procedures for recruitment of employees	Procedures in place ensure that appropriate reference checks, terrorism checks, and verification of academic records is undertaken. Procedures to ensure police checks are conducted, where possible, will be introduced immediately.
Vetting procedures on individual consultants	Procedures will be enhanced to ensure reference checks are extended to all consultants and project staff, and we will investigate ways to improve background checks on non-UK individuals. We shall also investigate and collaborate with DFID and other suppliers to improve mechanisms preventing other organisations from engaging any staff who have acted inappropriately whilst working for MSP.
Due diligence on suppliers	Templates are used to gather information on our partners and sub-contractors, including their policies and viability as a supplier. Procedures also in place to request samples of such information as verification.
Health and safety procedures	Health and safety procedures are in place in the UK office to ensure we meet the stringent standards required by law.

Security	Systems are in place to assess security during design phase, and a third party security information and emergency contact service is in place to support our operations. Pre-mobilisation safety/security information is provided to anyone travelling to the field.
Risk management procedures	Projects maintain a risk matrix. Whilst this is primarily focussed on programmatic risks, risks to staff are identified when appropriate. A central fraud risk matrix is also maintained in London.
Data protection procedures	Procedures are in place in the UK to comply with data protection legislation, and MSP has Cyber Essentials certification.

Procedures for Reporting and Case Management

While preventing incidents and ensuring procedures are in place to safeguard individuals in a proactive and preventative way, it is critical that there are appropriate procedures for monitoring, reporting and ensuring that cases are dealt with efficiently and effectively. The following procedures have been designed to meet this requirement:

Procedure	What does it cover?
Grievance procedures	The MSP Employee Handbook has grievance procedures that are documented and available to staff. In the field, project staff and consultants abide by the grievance procedures specified in project-specific administration manuals. A grievance panel, with diversity and independence, has been established to investigate cases.
Whistleblowing facility	MSP has a whistleblowing facility on its website which allows anyone, whether an employee, project personnel, supplier, stakeholder, beneficiary, or member of the public, to report incidents.
Reporting to authorities	Where appropriate and commensurate to the circumstances, MSP reports all criminal acts by an employee or other personnel or supplier to the relevant authorities, whether that be in the UK and/or the country of operation.

Measurement of Outcomes

All suppliers, whether they be individuals or companies, must sign up to our code of conduct and are subject to audit at any time. Any contravention of human rights will be documented and reported and will result in the partner relationship being terminated.

Internally, we ensure that everyone understands the importance of respecting human rights in our work, through awareness-raising sessions. We maintain a string due diligence process that highlights and communicates risks to internal and external partners related to human rights. Staff have received investigation, disciplinary & grievance training.

Going forward, we will publish in our COP, the number of cases and areas where these Principles have not been met.

3. 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; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.

All employees are made aware of company policies and are provided an employee handbook setting out their rights, responsibilities and their compensation and benefits. This handbook is regularly updated by our specialised HR lawyers, Peninsula.

All staff receive training on our Modern Slavery Policy & Human Trafficking Policy and what the Modern Slavery Act means, our legal position, how to identify those involved in slavery or trafficking and risk points. We also provide training to all staff on safeguarding.

All individual associate consultants and companies as part of our supply chain are provided contracts and must sign up to our code of conduct, which we are able to audit at any time for compliance. Our policies and code of conduct link in with those on Human Rights, to ensure the company's values and standards are shared amongst our staff, consultants and partners working with us.

Maxwell Stamp PLC recognises that its practices and processes do not routinely engage with children, although some of the projects MSP designs, implements and monitors around the world do. MSP therefore recognises that it has a duty of care towards the children it comes in contact with through its projects, and acknowledges its responsibility to keep children safe in all its development project interventions. Our Child Protection Policy has been defined in line with the standards recommended by "Standards for Child Protection", produced by the Keeping Children Safe Coalition.

MSP recognises that discrimination is unacceptable and although equality of opportunity has been a long-standing feature of our employment practices and procedures, we have adopted a formal equal opportunities policy. The aim of the policy is to ensure no job applicant, personnel 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.

This applies to all policies and procedures relating to recruitment and hiring, training, promotion, compensation, benefits, transfer, layoff, termination and other terms and conditions of employment. Employment decisions at MSP are based solely upon relevant criteria, including an individual's capabilities, qualifications, training, experience, and suitability.

MSP maintains a neutral working environment in which no personnel or worker feels under threat or intimidated.

Measurement of Outcomes

All suppliers, whether they be individuals or companies, are subject to audit at any time. Any contravention of our labour standards will be documented and reported and could result in the partner relationship being terminated. Staff have received training in Modern Slavery and it is provided to all new staff. Going forward, we will publish in our COP, the number of cases and areas where these Principles have not been met.

4. Environment

- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

Maxwell Stamp PLC maintains an Environmental and Sustainability Policy which is communicated through our Supplier Code of Conduct, staff handbook and online. MSP maintains a policy of "minimum waste" and recycling which is essential to the cost-effective and efficient running of all our operations. Our staff and all those who work for us are expected to promote this policy by taking extra care during their normal duties by turning off any unnecessary lighting and heating (including air-conditioning units), minimising printing, collecting and recycling office paper, or avoiding using disposable products.

The Company adopts a proactive approach to the management of our relationship and impact upon the physical, societal and economic environment within which we work. The Company acknowledges its environmental responsibilities as per the Environmental Protection Act 1990 and aims at integrating the three dimensions of sustainability (social, economic and environmental) in all aspects of its activities in the belief that commitment to the environment and sustainable development should be a fundamental and integral part of the business strategy.

The Company is committed to:

- Integrating sustainable practices into our operational processes;
- Meeting legislative requirements;
- Progressively implementing an environmental management system; and
- Raising awareness of the issues and our policies throughout the business and with our partners.

The Company will reduce the impact we have upon our physical environment and will operate sustainably by:

- Avoiding unnecessary or extravagant use of services, time, energy, etc. and conserving energy, water, wood, paper and other resources, particularly those which are scarce or non-renewable;
- Seeking to reduce our production of waste by encouraging re-use and recycling, using refurbished and recycled products and materials, where such alternatives are available and by using biodegradable substances where they provide the best environmental option and value for money;
- Seeking to identify and reduce direct and indirect social impacts of our operations in line with government advice and guidance;
- Encouraging our suppliers to provide environmentally preferable goods and services at competitive prices;
- Ensuring, where practicable, that our offices are managed following best environmental practice;
- Implementing projects that contribute to combating poverty and social exclusion; and
- Procuring products and services from suppliers that follow policies and strategies on sustainability aligned with our own.

Measurement of Outcomes

Regular communications around energy and waste management is provided to all staff. Going forward, we will publish in our COP, areas where the Company has had a positive impact on the environment.

5. Anti-Corruption

- **Principle 10:** Businesses should work against all forms of corruption, including extortion and bribery.

MSP has a zero tolerance policy on bribery and corruption in accordance with the UK Government's Bribery Act 2010. Any form of bribery, including facilitation payments is a criminal offence. Bribery may be defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action with the intent of gaining any commercial, contractual, regulatory or personal advantage. MSP therefore requires compliance, from everyone connected with the company, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to MSP and the company has a zero tolerance attitude towards corrupt activities of any kind, whether committed by MSP personnel or by third parties acting for or on behalf of the company.

MSP does not tolerate corruption in any form, whether directly or indirectly. Corruption causes poverty and suffering, inhibits economic growth, is damaging to business, and may result in criminal and civil liability and penalties for any personnel or person working on behalf of MSP.

If MSP suspects that any individual (s) or supplier (s) have committed an act of bribery or attempted bribery, an investigation will be carried out and in line with the company's disciplinary procedure.

If anyone, as a person or supplier working on MSP's behalf, suspect that an act of bribery or attempted bribery has taken place, even if they are not personally involved, they are expected to report this to the Company's Anti-Bribery and Corruption Director, or through the whistleblowing facility.

The Company maintains several policies and procedures which cover Anti-Corruption:

- Bribery and Anti-Corruption Policy;
- Whistle-Blower Policy; and
- Due Diligence Policy

which set out our beliefs and values in constantly striving to maintain the highest professional, ethical and moral standards. Our reputation is built upon our company values, the behaviour of our employees and those that work for us and our collective commitment to continue to provide education for all levels of staff and contractors about corruption, as well as what to do if they should encounter it. It is our mission to create a transparent and open working environment in which people feel able to speak freely and challenge behaviour at every level, with discourse, but also where they can discuss issues in confidence, where necessary.

Measurement of Outcomes

All staff are regularly informed and made aware of working against all forms of corruption through awareness raising sessions. Our due diligence process mitigates risks against all forms of corruption. Our reporting and whistleblowing procedures allow claims related to fraud, bribery and corruption to be dealt with in an effective manner. Going forward, we will publish in our COP, the number of cases and areas where this Principle has not been met.

6. Examples of Programmes Maxwell Stamp PLC (MSP) has undertaken during the Reporting Period addressing the SDGs, include:

SDGs 1, 2 & 10

MSP is currently implementing the DFID funded Expanding Social Protection II in Uganda (ESP II) Programme. We are responsible for managing the two components of the programme: 1) the implementation of the SAGE (Social Assistance Grants for Empowerment) cash transfer; and 2) policy and support and capacity building of the Government of Uganda to take full ownership of the programme within four years. The programme administers and manages the disbursement of up to £36 million of cash transfers via a Payment Service Provider and using new technologies (e.g. mobile phone banking). The direct beneficiaries of the SAGE component are approximately 1,276,000 people receiving monthly cash grants.

SDGs 1, 3, 5, 10, 11 & 16

Funded by the Department for International Development (DFID), we have been helping to reduce gender inequality throughout Uganda. The Support to Uganda's Response on Gender Equality (SURGE) Programme intends to provide equal access to women and men to opportunities and a life free from violence for women. MSP has committed to increasing awareness of gender and equity issues in communities and the public sector, improving demand for, funding for, access to and quality of gender and equity responsive services and facilitating the spread of positive behavioural norms over a broad cross-section of society. The programme has three predetermined outputs:

1. National capacity established within the Ministry of Gender, Labour and Social Development (MGLSD), the Equal Opportunities Commission (EOC) and Ministry of Finance, Planning and Economic Development (MoFPED) to lead on integration of gender and equity in public finance management.
2. Improved public awareness and progressive change in social norms that perpetuate gender inequality and gender based violence.
3. Increased access to safe spaces/shelter, legal, health, psychosocial services and economic opportunities by survivors of gender based violence.

SDGs 5, 8, 9, 10 & 16

We have been supporting the EBRD's ongoing initiatives to support private sector development and strengthen the investment climate in Tajikistan. It aimed to do so by building capacity among relevant policy making bodies to systematically identify opportunities for investment climate reform (including legal, regulatory and policy related obstacles) that address the needs of women entrepreneurs and to assess the impact of proposed reforms on women-led businesses.

SDGs 1, 4, 5, 7, 8, 9 & 10

DFID Ghana commissioned Maxwell Stamp to undertake a Mid-Term Review and Annual Review of the Western Region Coastal Foundation (WRCF) Programme. WRCF was designed to make effective use of Corporate Social Responsibility (CSR) funds of oil companies for development, conflict-prevention and growth in Ghana's oil-producing Western Region. WRCF supports pilot and scaling-up of interventions and provides technical assistance and related services to industry-led CSR initiatives as well as government, development partner and donor funded socio-economic development initiatives. The WRCF's Dialogue Platform works to build trust between communities, government, and industry in the six project districts and to help government and industry develop interventions so that the community at large can benefit both economically and socially from the presence of the oil, gas, and power industry.