

# MEMORANDUM

SUBJECT : UN Global Compact Communication On Progress (COP)

DATE : December 2018

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## 1 Period covered

Period covered by your Communication on Progress

(COP) From: 21/12/2017

To: 21/12/2018

## 2 Statement of continued support by the Chief Executive Officer (CEO)

*Please provide a statement of your company's chief executive expressing continued support for the Global*

*Compact and renewing your company's ongoing commitment to the initiative and its principles (Please include name and title of the chief executive at the bottom of the statement).*

21 December, 2018

To our stakeholders:

I am pleased to confirm that Fideres Capital (Fideres) reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,



Alberto Thomas,  
Partner

### 3 Human rights principles

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

#### 3.1 Assessment, Policy and Goals

*Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments and company goals on Human Rights.*

Human rights is very important at Fideres. We aim to ensure proper labour and working conditions, to safeguard the health and safety of the employees and to promote the social development of the communities in which we operate.

Fideres is committed to implement a policy of support for the internationally recognized human rights contained within the Universal Declaration of Human Rights. Fideres is fully committed to equal opportunities and diversity and values its people for their skills, experience and potential regardless of gender, sexual orientation, age, race, colour, ethnic origin, religion or disability. This commitment is always considered when reviewing new applicants for employment.

Fideres operates an open-door policy wherein employees are free to access the senior management team for redressal of issues

Examples

- Reference to (statement of support for) the Universal Declaration of Human Rights or other international standards
- Written company policy on respecting Human Rights and preventing potential abuses (e.g. in code of conduct)
- Policy requiring business partners and suppliers to adhere to the principles on Human Rights
- Assessment of Human Rights related risks and impact in industry sector and country(ies) of operation (see Risk Assessment Report at [www.humanrights.business.org](http://www.humanrights.business.org))
- Specific goals in the area of Human Rights for the upcoming year

#### 3.2 Implementation

*Description of concrete actions to implement Human Rights policies, reduce Human Rights risks and respond to Human Rights violations.*

We actively inform our partners, investors and employees of our commitment and encourage them to commit as well.

Our company culture encourages awareness on the topic of human rights. We maintain a flat management structure whereby employees are free to voice their opinions, and their input is valued.

We schedule employee feedback sessions to receive employee's opinions on how we can improve their working conditions. These exercises are taken seriously by management.

We motivate our employees to learn more about the value of human rights and its importance in the sustainable development of a business

#### Examples

- Anonymised employee feedback forms
- Suggestion box, call center or grievance mechanism
- Awareness raising or training of employees on Human Rights
- Consultation with stakeholders and affected parties
- Allocation of responsibilities for the protection of Human Rights within your company
- Human resource policies and procedures supporting Human Rights

### 3.3 Measurement of outcomes

*Description of how the company monitors and evaluates performance.*

Fideres has created a harmonious working environment for its employees, and wishes to maintain the highest standards of integrity with everyone with whom it deals. Fideres continues to encourage a culture that values meritocracy, openness, fairness and transparency. All the managers and employees are responsible for the promotion and advancement of this policy and any behaviour that transgresses this policy is not tolerated. Fideres conducts semi-annual performance reviews whereby a clear channel of communication between employer and employee is established. These values apply to all of Fideres' processes relating to employment, training, development, performance management and rewards.

Within this reporting period, Fideres has not been subject to any investigation, legal cases or incidents involving the violation of human rights. The management team reviews the ESG policy annually to see where improvements can be made.

#### Examples

- Specific progress made in the area of Human Rights in the past reporting period
- Information about how your company deals with incidents of Human Rights violations
- Investigations, legal cases, rulings, fines and other relevant events related to Human Rights
- Periodic review of results by senior management
- External audits of Human Rights performance

## 4 Labour principles

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

### 4.1 Assessment, Policy and Goals

*Description of the relevance of labour rights for the company (i.e. labour rights related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.*

Training and development are vital to the sustainability of our business. Fideres' business model derives value from the knowledge and expertise of its employees.

Fideres is fully committed to equal opportunities and diversity. Fideres values its people for their skills, experience and potential regardless of gender, sexual orientation, age, race, colour, ethnic origin, religion or disability;

Diversity and inclusion is of utmost importance to our Company. Fideres provides a platform for all employees to mentor one another, network and develop their careers. Majority of the consulting project work is team based, and the company encourages collaboration.

Each employee is issued with a contract of employment stating their terms and conditions of employment with clearly stated pay rates, length of annual leave, working hours etc. This we consider as fair, just and fully in accordance with English law.

#### Examples

- Reference to ILO Core Conventions or other international instruments
- Written company policies to uphold the freedom of association and collective bargaining and the elimination of forced labour, child labour and employment discrimination
- Written policies that clearly state employee rights and responsibilities and their compensation and benefits
- Policy requiring business partners and suppliers to adhere to the Labour principles
- Assessment of labour-related risks in the industry sector and country(ies) of operations
- Specific goals in the area of Labour Rights for the upcoming year

### 4.2 Implementation

*Description of concrete actions taken by your company to implement labour policies, reduce labour risks and respond to labour violations.*

In Q4 2018, Fideres implemented a new employee benefits programme, which included a few policies aimed at improving all of our employees' work lives, such as flexible working hours and working from home days.

Health and Safety Laws are clearly communicated to staff through our Health and Safety Policy book. Fideres encourages a healthy workforce and provides a subsidy for gym memberships as part of its employee benefits programme.

Fideres sponsors its employees for study material and examination fees to maintain a high level of competence in our field. We promote our employees personal growth and development.

The importance of our employee's health and well-being is promoted throughout our policies and objectives. We have established a number of programs available to employees and their family members such as AXA PPP private health insurance, private pension plans, cycle to work schemes etc. In 2018, Fideres added private GP appointments as part of its employee benefits programme.

Fideres believes in recruiting, developing and retaining the best talent from the widest pool in order to promote a stimulating, rewarding and inclusive environment where everyone's contribution is recognized, valued and respected;

#### Examples

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training for employees on labour rights and policies
- Describe how the health and safety of all employees is ensured
- Describe how your company prevents discrimination of all kinds and ensures comparable pay for comparable work
- Consultation with employees and other stakeholders
- Allocation of responsibilities for the protection of labour rights within your organization
- Human Resource policies and procedures supporting the Labour principles
- Participation in international framework agreements and other agreements with labour unions

### 4.3 Measurement of outcomes

*Description of how the company monitors and evaluates performance.*

Periodic performance reviews, are formally conducted bi-annually, with informal reviews given after each project. These reviews involve setting goals which aim to be achieved over the year. These goals are periodically reviewed to ensure the employees are on track to achieve these goals. This ensures employees understand how they are progressing and provides feedback to improve in the future.

During the reporting period, there have not been any Statutory Notices nor Prosecutions brought against Fideres, with regard to health and safety, or any legal cases to the contravention of Global Compact Labour principles.

Initial feedback following the introduction of the new employees' benefits programme has been very positive from employees. Fideres aims to keep listening to employee feedback and continually improve our policies.

In accordance with our goal of assisting our employee's career development, we have introduced a policy of sponsoring employees working towards professional qualifications.

Examples

- Demographics of management and employees by diversity factors (e.g. gender, ethnicity, age, etc.)
- Describe how your company deals with incidents of violations of the Global Compact Labour principles
- Investigations, legal cases, rulings, fines and other relevant events related to Labour
- Periodic review of results by senior management
- Specific progress made in the area of Labour during the last reporting period
- External audits (e.g. SA 8000)

## 5 Environmental principles

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

### 5.1 Assessment, Policy and Goals

*Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.*

Fideres is committed to constantly finding ways to operate more sustainably, responsibly and efficiently. We are dedicated to complying with environmental regulations, pursuing opportunities to surpass standards and continuously improving our environmental management systems.

Fideres recognizes that its activities have an impact on the environment and its policy is to limit this impact as far as possible. Fideres is committed to ensuring that its business is environmentally responsible, energy efficient and puts its best efforts to achieve continuous improvements.

Fideres recognizes that its key environmental impacts are:

- Generation of waste;
- Use of energy, water, manufactured products and natural resources.

## Examples

- Assessment of the environmental footprint and impact of your company
- Written company policy on environmental issues, including prevention and management of environmental risks
- Policy requiring business partners and suppliers to adhere to the environmental principles
- Describe specific goals in the area of the environment for the upcoming year

## 5.2 Implementation

*Description of concrete actions to implement environmental policies, reduce environmental risks and respond to environmental incidents.*

To address key issues of environmental concern and minimize its environmental impact, Fideres is committed to:

- reduce the production of and recycle waste;
- efficiently use energy, water, manufactured products (e.g. paper) and natural resources;
- monitoring of the electricity usage of all offices to identify energy waste;
- increase use of videoconferencing to minimize air travel;
- increase use of rail travel as opposed to air/private cars when appropriate;
- source products that are made from sustainable sources or recycled materials or that are designed to be easy to reuse or recycle wherever practicable;
- eliminating, where possible, the use of products made from unsustainable natural resources (i.e. plastic bottles);

## Examples

- Awareness raising or training of employees on environmental protection
- Initiatives and programmes to reduce waste materials (e.g. recycling) and consumption of resources (energy, fossil fuels, water, electricity, paper, packaging, etc.)
- Activities aimed at improving the energy efficiency of products, services and processes
- Development and diffusion of environmentally friendly technologies
- Raise awareness among suppliers by asking for the environmental footprint of products or services
- Environmental management system to identify, monitor and control the company's environmental performance
- Allocation of responsibilities for environmental protection within your company



### 5.3 Measurement of outcomes

*Description of how the company monitors and evaluates environmental performance.*

We make our best efforts to review our suppliers' policy regarding the environment before engaging in business with them. We take into account sustainable environmental impact into our investment decisions.

No investigations, legal cases or fines have been made against Fideres to date regarding the environment. The management team reviews the ESG policy annually to see where improvements can be made.

#### Examples

- Information about how your company deals with incidents
- Investigations, legal cases, rulings, fines and other relevant events related to environmental principles
- Specific progress made in the area of the environmental protection during the last reporting period
- Periodic review of results by senior management
- External audits of environmental performance

## 6 Anti-Corruption principles

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

### 6.1 Assessment, Policy and Goals

*Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.*

All new consultants at Fideres must take relevant regulation exams about anti-corruption laws in order to be approved by the financial regulator. It is our company policy to conduct all of our business in an honest and ethical manner. We have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. Furthermore, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

#### Examples

- Assessment of risk of corruption and bribery in the company's industry and country(ies) of operation
- Written company policy of zero-tolerance for corruption, bribery and extortion



- Reference to (or statement of support for) the UN Convention Against Corruption and other international instruments
- Protocol to guide staff in situations where they are confronted with extortion or bribery
- Policy requiring business partners and suppliers to adhere to the anti-corruption principles
- Specific goals in the area of anti-corruption for the upcoming year

## 6.2 Implementation

*Description of concrete actions to implement anti-corruption policies, reduce anti-corruption risks and respond to incidents.*

All new employees are presented with our anti-corruption and bribery policy handbook. This handbook details the employee's responsibilities and record-keeping which must take place. We ensure all our employees are well aware of the applicable laws and regulation in place by sponsoring them to take the Chartered Institute of Securities and Investments qualification in Derivatives. Within this qualification, various sections test our employees on their knowledge of current UK Regulation including anti-corruption laws.

Our policy and procedures in this area are subject to annual review by Senior Management.

Examples

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training of employees about company's policies regarding anti-corruption and extortion (e.g. mailings, internet, internal communication, etc.)
- Allocation of responsibilities for anti-corruption within the company
- Participation in industry initiative or other collective action on anti-corruption

## 6.3 Measurement of outcomes

*Description of how the company monitors and evaluates anti-corruption performance.*

The management team takes part in annual anti-corruption courses to ensure compliance with current regulation. The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Senior management takes responsibility for anti-bribery and corruption compliance within the business and has produced a statement which illustrates senior management's commitment to anti-bribery and corruption.

No investigations, legal cases or fines have been made against Fideres to date regarding corruption. The management team reviews the ESG policy annually to see where improvements can be made.

The compliance manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

#### Examples

- Information about how your company deals with incidents of corruption
- Internal audits to ensure consistency with anti-corruption commitment, including periodic review by senior management
- Investigations, legal cases, rulings, fines and other relevant events related to corruption and bribery
- Specific progress made in the area of anti-corruption during the last reporting period
- External audits of anti-corruption programmes