

Communication on Engagement (COE)

December 2018

Period Covered by this Communication: 03 March 2018 – 3 March 2019

Part 1: Statement of Continued Support

03 March 2019

To our stakeholders:

I am pleased to confirm that the SKA International Group reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In this Communication of Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles as suggested for an organization like ours.

We also commit to sharing this information with our stakeholders using our primary channels of communication.

Yours Sincerely,

Michael Douglas
President & CEO



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Part II: Description of Activities

SKA International Group remains committed to the principles and goals of the UN Global Compact and is actively supporting their achievement through the ongoing partnership that the Institute has with the UN Global Compact for delivery of the special issues initiative. SKA acknowledges and respects the principles contained in the United Nation's Universal Declaration of Human Rights.

HUMAN RIGHTS PRINCIPLES

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.

In 2018, we had zero major grievances reported by any employee in the organization related to harassment or trafficked labor.

Suppliers

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. 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.

In 2018 we have updated our supplier registration policy in accordance with TRACE International Guidelines and now require commitment from all our suppliers to the human rights principles. Reregistration of our suppliers continues throughout 2019. On breaches of the principles have been identified thus far. We are TRACE Certified since 2017.

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.



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Implementations

Description of Concrete actions to implement Human Rights Policies, reduce Human Right risks and respond to Human Rights Violations.

In addition to those specific actions noted above, SKA strives to provide a safe and healthy working environment for all its employees. Our workplace policies and practices have been revised and updated in line with our internal review guidelines and our Quality Management System under ISO 9001:2015. Our 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

Description of how the company monitors and evaluates performance.

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.

Furthermore, our suppliers are monitored and reviewed annually through our supplier registration process.



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