



# COMMUNICATION ON PROGRESS 2018

## Annual Submission to the United Nations Global Compact

28 February 2018

# Contents

Section 1. Statement of Support

Section 2. Approach

Section 3. Human Rights Principles

Section 4. Labour Principles

Section 5 – Environment Principles

Section 6. Anti-Corruption Principles

## Section 1. Statement of Support

MannionDaniels is a global company offering consultancy and fund management services. Our mission is to work for a healthy, equitable, inclusive, safe and sustainable world. We focus on fragile and conflict-affected states, to ensure that our work reaches the world's poorest and most vulnerable people.

For the past 19 years, MannionDaniels has established strong relationships with governments, communities and organisations in developing countries to deliver systems and services to those who need them most. Our vision is to find creative solutions to complex issues in health, social justice and social development. Through our work we are committed to practicing business as a force for social and environmental good.

The values of the UN Global Compact and the Sustainable Development Goals (SDGs) are integrated into our work at MannionDaniels. I would like to take this opportunity to publicly affirm our commitment and 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, as well as our plans for the future. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

A handwritten signature in black ink that reads 'D. Daniels'.

David Daniels,  
Managing Director  
Mannion Daniels Limited

## Section 2. Approach

At MannionDaniels, we believe in upholding the dignity of all people by working to achieve common goals of economic prosperity, environmental sustainability, social inclusion, and ethical business conduct. Our business culture promotes international human rights and encourages diversity and equal opportunities for all. Since joining the UN Global Compact in 2017, we have made a concerted effort to embed the framework in our business strategy, culture and daily operations. Furthermore, we have looked at how to use the framework for our corporate social responsibility and sustainability initiatives and reporting. We have structured our Communication on Progress according to the UN Global Compact Principles. The Principles are:

### 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

### 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

### Environment 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

### Anti-Corruption Principles

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



## Section 3. Human Rights Principles

### 3.1 Assessments of Policies and Goals

#### **Business Code of Ethics**

MannionDaniels takes a principles-based approach to business and has enshrined human rights in our work. Our Business Code of Ethics sets out the values, business culture, and practices that we expect of MannionDaniels employees and business partners (sub-contractors, suppliers, consultants, etc.) throughout our supply chain. It is anchored by six values that are the foundation of all that we do. These values are: accountability, integrity, inclusion, high performance, transparency, and environmental responsibility. In the conduct of business activities, we and our supply chain pledge to the following: commitment to high standards of ethical conduct and practice, professionalism through the supply chain, acceptance of accountability, promotion of fair and healthy competition, objectivity in decision-making, integrity of procurement and recruitment processes, protection of assets, information, privacy and confidentiality, and adherence to UK law and international governance.

#### **Anti-Slavery and Human Trafficking**

We take a zero-tolerance approach to modern slavery and implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains. Our Modern Slavery and Human Trafficking Policy unequivocally states that we do not condone use of forced labour and human trafficking and details measures, responsibilities and structures for identifying and mitigating risks of this in our business and supply chain. It also emphasizes that we will not knowingly engage with business partners and associates who violate these laws. To support this policy, we issue an annual modern slavery statement and develop and monitor key performance indicators relating to our business operations and modern slavery. We adhere to these principles and measures to safeguard against modern and human trafficking slavery:

- Prevent, detect, and report modern slavery and human trafficking in any part of our operations or supply chain
- Apply an evidence-based assessment of the capability and capacity of our supply chain, and a structured and proportionate methodology to identify and assess risks
- Raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier at the earliest possible stage
- Notify a senior responsible officer as soon as possible if there is a belief or suspicion that a conflict with this policy has occurred, or may occur in the future or report it in accordance with the MannionDaniels' Whistleblowing Policy as soon as possible
- If it is unclear whether an act, the treatment of workers more generally, or their working conditions within our supply chains constitutes any of the various forms of modern slavery, raise it with a person in a position of responsibility.

## **Due Diligence**

We assess the fitness of potential suppliers in relation to MannionDaniels requirements prior to entering into a business relationship or contract for services, including reviewing technical competency and ethical standards to help us make an informed decision. MannionDaniels' due diligence process follows a staged approach, starting with light touch assessment and basic checks to screen potential suppliers before moving to a more thorough assessment of those selected for contracting. The stages followed under this approach are financial due diligence, integrity due diligence, and fiduciary management assessment. Undertaking these due diligence checks provides us with assurance that we only engage with business partners and individuals that have high competency and meet our ethical standards.

## **Whistleblowing**

MannionDaniels is committed to acting in accordance with the highest standards of business integrity and accountability. Our Whistleblowing policy outlines our commitment to upholding ethical values and practices and promotes a business culture that enables staff, business partners and others to feel comfortable raising concerns without fear of retribution. It allows for the reporting of concerns including, but not limited to human rights, corruption, fraud, human trafficking, slavery, health and safety, safeguarding and terrorism.

## **3.2 Implementation**

MannionDaniels expects employees and business partners to abide by our Business Code of Ethics. Our contractual arrangements put in place the requirements to comply with it and our other policies. We also detail the repercussion for breaching those provisions and engaging in misconduct. MannionDaniels staff are expected to complete training upon engagement with the company and refreshers from then onwards. Topics covered in the training are:

- Business Code of Ethics
- Safeguarding Children and Vulnerable Adults
- Anti-Corruption, Bribery and Fraud (under development)
- Whistleblowing (under development)
- Modern Slavery (under development)
- Equality and Diversity (under development)

MannionDaniels’ whistleblowing hotline facilitates the reporting of possible illegal, unethical, or improper conduct when the normal channels of communication have proven ineffective or difficult. The hotline is available to be used by all our employees, as well as clients, business partners and others in a business relationship with MannionDaniels. Any suspicion of human rights and other forms of human rights, corruption, fraud, human trafficking, slavery, health and safety, safeguarding, terrorism, and any other misconduct can be reported on our anonymous, free-to-call and confidential hotline.

### 3.3 Measurement of Outcomes

Achieved in 2018	Planned for 2019
<ul style="list-style-type: none"> <li>• Outlined our values in our business code of ethics, including a declaring our commitment to uphold human rights</li> </ul>	<ul style="list-style-type: none"> <li>• Promote code of ethics internally and within our supply chain.</li> </ul>
<ul style="list-style-type: none"> <li>• Developed and operationalised a comprehensive set of policies covering due diligence, whistleblowing, modern slavery, data protection, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Review and update policies and new ones where needed to outline a commitment to human rights, privacy, dignity, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• Conducted training on values, ethics, and safeguarding.</li> </ul>	<ul style="list-style-type: none"> <li>• Institutionalise the training of all new starters and provide refresher ethical training for staff.</li> </ul>
<ul style="list-style-type: none"> <li>• Updated project and operational risk and issue management procedures to cover safeguarding, human rights, and modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>• Deliver specialist training for project staff and other key staff</li> </ul>
<ul style="list-style-type: none"> <li>• Issued our second annual modern slavery statement</li> </ul>	<ul style="list-style-type: none"> <li>• Issue third annual modern slavery statement</li> </ul>

## Section 4. Labour Principles

MannionDaniels aims to create a workplace that encourages diversity and equal opportunities for all. Keeping staff and consultants safe is an important aspect of this and Health and Safety is embedded in all aspects of our business operations. Our aim is that each employee and business partner feel respected and able to give their best. We are committed to transparency in all business dealings, including taking a zero-tolerance approach to corruption, bribery, fraud, tax evasion, human rights violations, sexual abuse and modern slavery.

### 4.1 Assessments of Policies and Goals

We value diversity and inclusion at MannionDaniels and provide equality and fairness for all in our employment. We do not discriminate on grounds of gender, gender reassignment, marital status (including civil partnership), pregnancy or maternity, race, ethnic origin, nationality, national origin, disability, sexual orientation, religion or age. Our commitment to universal labour principles is enshrined in our company firstly by the Business Code of Ethics. It is also embedded and supported through this set of policies: recruitment and new starter, equality and diversity, family, flexible working, and corporate social responsibility and sustainability. This is evidenced by our annual modern slavery statement and our safeguarding children and vulnerable adults policy.

### 4.2 Implementation

Our Human Resources Team leads on diversity, equality, and inclusion in the workplace. As a company, we raise employees' awareness of corporate responsibility, encourage employee professional development and learning, and encourage an internal or external volunteering culture. We also track diversity statistics of our workforce. In 2018, we introduced flexible working policy and promoted good health and wellbeing including a mental health awareness week. Our staff have access to benefits and external support such as emotional support services. Currently, all new staff undergo a new starter induction session covering our working practice and labour standards. We rolled out safeguarding training for all staff. We aim to further institutionalise the training of all new starters and refresher training for staff.

For our business partners, our due diligence and procurement policies and procedures outline our approach for managing our supply chain and ensuring adherence to high labour standards. The MannionDaniels Operations and Compliance Team is responsible for managing our supply chain, including ensuring our company and business partners meet labour standards in countries where we operate.

We assess, respond and manage risks for our projects and business operations. We have updated the MannionDaniels Risk Management policy and framework. It now includes mandatory identification of environmental, modern slavery and safeguarding risks. A safeguarding serious incident is an adverse event, whether actual or alleged, which results in, or risks, significant harm to our organisation's beneficiaries, employees or others who come into contact with our organisation, through its work. We are considering specialist training for staff and other training for our business partners.



## 4.3 Measurement of Outcomes

MannionDaniels has developed a safeguarding statement and policy in 2018. We have assigned internal safeguarding responsibilities in the company. The Safeguarding Team has representation from each level of governance: Board level, Leadership Team, and Senior Management Team. The Safeguarding Director, Safeguarding Lead and Deputy Safeguarding Lead have all received safeguarding training and have dealt with safeguarding cases previously. Safeguarding violations and other misconduct can be reported to line managers, safeguarding team, and via our whistleblowing hotline. We conduct investigations into safeguarding incidents, log them and track them in registers. We also notify clients and relevant authorities and record safeguarding incidents in a log and register.

Achieved in 2018	Planned for 2019
<ul style="list-style-type: none"> <li>Promoted a positive culture in the workplace and offered information, resources and events to foster discussion, including about mental health and wellbeing.</li> </ul>	<ul style="list-style-type: none"> <li>Deliver training on ethics, whistleblowing and labour standards internally and within our supply chain, including raise awareness about responsibilities and mechanisms for reporting.</li> </ul>
<ul style="list-style-type: none"> <li>Developed and operationalized a comprehensive set of policies covering recruitment, grievance, flexible working, family, equality, and diversity, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to improve the onboarding, orientation and training programme for staff, consultants and business partners.</li> </ul>
<ul style="list-style-type: none"> <li>Develop a safeguarding policy and statement. Raised awareness amongst staff on safeguarding via webinar, project team sessions with consultants.</li> </ul>	<ul style="list-style-type: none"> <li>Institutionalise safeguarding and other the training of all new starters and refresher training for staff and business partners. Strengthen contractual arrangements for staff and business partners.</li> </ul>
<ul style="list-style-type: none"> <li>Undertook a modern slavery assessment which informed the development of a modern slavery policy.</li> </ul>	<ul style="list-style-type: none"> <li>Deliver specialist training for project staff and other key staff in areas (e.g. modern slavery).</li> </ul>
<ul style="list-style-type: none"> <li>Conducted workplace assessments and diversity data presented at the company meeting.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to monitor and promote diversity and identify improvements throughout our business operations</li> </ul>
<ul style="list-style-type: none"> <li>Undertook project and supply partners risk assessments which cover labour and safeguarding, especially children, young people, and vulnerable adults.</li> </ul>	<ul style="list-style-type: none"> <li>Continue mapping our supply chain and manage risks and provide training where required.</li> </ul>

## Section 5. Environment Principles

### 5.1 Assessments of Policies and Goals

Being an environmentally responsible company is one of our core values. We are achieving this through our ISO 14001 certification, but also by developing our own green projects. We believe that caring for the environment is inseparable from our work in for a healthy, equitable, inclusive, safe and sustainable world. We aim to promote an understanding of the interdependence of health, well-being and the environment, both in developing countries and the UK, and to make environmental consideration pivotal to our work. As a company, we are committed to protecting the environment, preventing pollution, complying with environmental legislation and other requirements relevant to our activities. Consideration and monitoring of these factors in alignment with the business activities help to form our Environmental Management System (EMS), providing a framework for setting environmental objectives. The EMS, its policies and procedures are reviewed annually to ensure continual improvement and enhance our environmental performance.

### 5.2 Implementation

Within our environmental management system, we have identified that emissions from international flights cause our most significant negative environmental impact but are unavoidable for fulfilling international projects. To offset our impact, we have created an in-house project investing in projects that reduce emissions - such as renewable energy.

Our Green Office Action Plan targets one of our primary environmental aspects coming from office energy use and waste. It encompasses energy efficiency, waste prevention, recycling, and environmentally aware purchasing.

We have selected renewable energy for our investments as it is an effective part of transitioning to a lower carbon economy, but the industry does not receive reliable or sufficient government support in the UK. Supporting renewable energy is an example of how businesses can take environmental initiative, accept responsibility and be agents of positive change.

Supporting a renewables revolution ties into our support of the Sustainable Development Goals, specifically Goal 7 'Affordable and Clean Energy' and Goal 13 'Climate Action'. We currently have a portfolio of Green Investments which are predominantly selected to benefit communities near our head office in the UK. Investments are calculated and selected annually.

To further our objectives of using business as a force for social and environmental good outside of our core services, MannionDaniels has also instigated community initiatives using our own resources. These are intended to provide funds to initiatives that have a positive impact in communities where we work.

## 5.3 Measurement of Outcomes

Achieved in 2018	Planned for 2019
<ul style="list-style-type: none"> <li>Mitigated the impact of travel emissions. We calculated the offset value of flights and used amount to invest in a local sustainable energy project. Employees selected renewable energy projects, including the Sailing Trading Company, for us to invest in at the 2018 company meeting. We invested in two projects via Abundance.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to mitigate the impact of travel emissions. Calculate offset value of flights and use amount to invest in local sustainable energy projects and over offset by 10%.</li> </ul>
<ul style="list-style-type: none"> <li>Embedded a culture of resource efficiency by providing on-going training and environmental updates.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to monitor and improve the effectiveness of Environmental Awareness training through monitoring of waste and conducting surveys on awareness.</li> </ul>
<ul style="list-style-type: none"> <li>Promoted culture of resource efficiency by tracking recycling and general waste for the first time in 2017.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce total mixed recycling and general waste by 5% by the end of 2019</li> </ul>
<ul style="list-style-type: none"> <li>Launched first community initiative in Kenya using our own resources. We are supporting the Community Health Initiative Group who are providing access to treatment and prevention of jiggers in Kakamega, Kenya.</li> </ul>	<ul style="list-style-type: none"> <li>Select further projects to support in 2019.</li> </ul>

## Section 6. Anti-Corruption Principles

MannionDaniels has a 'zero tolerance' policy towards bribery, fraud, and corruption and so does not accept any level of bribery, fraud or corruption within our company. We are committed to the highest standards of ethical conduct and integrity in our business activities. All employees, business partners and all individuals acting for the company anywhere in the world, are expected to conduct themselves professionally and within the law.

### 6.1 Assessments of Policies and Goals

MannionDaniels has an Anti-Corruption, Fraud and Bribery Policy. It is part of a suite of measures, including conflict of interest, due diligence, whistleblowing and finance, employed to promote and ensure ethical and lawful business conduct. We introduced a robust Anti-corruption, Fraud and Bribery framework to ensure the company, as far as is reasonably possible, manages the risk of bribery, fraud corruption occurring in relation to its commercial activities.

### 6.2 Implementation

MannionDaniels consider effective risk management as an essential element in facilitating good decision making throughout the delivery of projects and in our business operations. We often operate in higher corruption-risk environments and, as such, has introduced a robust Anti-corruption, Fraud and Bribery framework. The Anti-corruption, Fraud and Bribery framework comprises these key elements that complement one another:

A commitment of the company to conduct business lawfully

- The assessment of bribery, fraud and corruption risks across the business
- Procedures that are designed to proportionately manage the risk of bribery and corruption occurring
- Regular training and communication on the Anti-corruption, Fraud, and Bribery framework
- Guidance on seeking advice and raising concerns
- Regular reviews of the Anti-corruption, Fraud and Bribery framework
- Management of gifts and hospitality, and conflicts of interests

- Management of charitable donations, sponsorships and lobbying activity
- Financial controls
- Whistleblowing procedures and mechanisms

Non-compliance with our Anti-Corruption Policy and Framework is subject to possible disciplinary action including contract termination, non-renewal or other appropriate actions. All employees, consultants, business partners suppliers, and associated person(s) for the company anywhere in the world, are expected to report any suspected malpractice or wrongdoing and to cooperate with any investigation of such concerns. Concerns can be raised by contacting a line manager, senior responsible officer, or the Director, Head of Operations. MannionDaniels is committed to investigating all incidents that are reported in line with Whistleblowing Policy. The Director, Head of Operations Director, is the lead on investigations; he coordinates with other company functions. All reports will be dealt with in confidence and only those who need to know will be informed and are recorded in a register. Reports are shared with relevant clients upon completion of an investigation. All whistleblowing incidents and logs are recorded in a register.

## 6.3 Measurement of Outcomes

Achieved in 2018	Planned for 2019
<ul style="list-style-type: none"> <li>• Reinforced company commitment to conduct business lawfully by updating the business code of ethics, anti-corruption and bribery framework, and related policies. Roll out of mandatory code of ethics code of ethics training.</li> </ul>	<ul style="list-style-type: none"> <li>• Invest in online training for staff and business partners covering anti-corruption, whistleblowing, etc.</li> </ul>
<ul style="list-style-type: none"> <li>• Instituted due diligence procedures including individuals and business screened and checked against with an external anti-corruption database using two industry leading products developed and managed by Dow Jones to certify their compliance with relevant legislation.</li> </ul>	<ul style="list-style-type: none"> <li>• Updated all training and procedures to reflect the new changes to due diligence</li> </ul>

- Regularly assessed bribery, fraud and corruption risks across the business and projects. Operational, financial and compliance audits and spot checks on projects and business operations.

- Issued guidance on seeking advice and raising concerns including via the whistleblowing hotline and DFID Fraud Mailbox.

- Provide bespoke support for high risk project.

- Deliver specialist training for project staff and business partners on the anti-corruption and whistleblowing

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