



UN Global Compact

Communication on Progress (COP)

21st March 2018 - 21st March 2019



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COMMUNICATION ON PROGRESS (COP)

Period covered by your Communication on Progress (COP)

From: 21st March 2018 To: 21st March 2019

1. STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER (OWNER OR PRESIDENT IN THE CASE OF SMALL BUSINESSES)

March 2019

To our stakeholders:

I am pleased to confirm that WYG International B.V. reaffirms its support for the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

At WYG, we apply our skills to create a positive, sustainable future for our business, society and the environment. We define sustainability broadly, covering all of the social, environmental and ethical aspects of what we do to help our clients meet their own sustainability goals. We believe that sustainability needs to be embedded in our own business strategies, decision making and practices at all levels and to that end, the Board, its committees and the operational management of the business routinely take account of social, environmental and ethical risks and opportunities in their decision making.

Over the last two decades, we have built upon our skills and experience to assist in strengthening societies by reducing poverty, improving education and infrastructure, enhancing trade, strengthening institutions and promoting social inclusion.

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

Yours faithfully,



Keith J Cook
Managing Director, WYG International B.V.

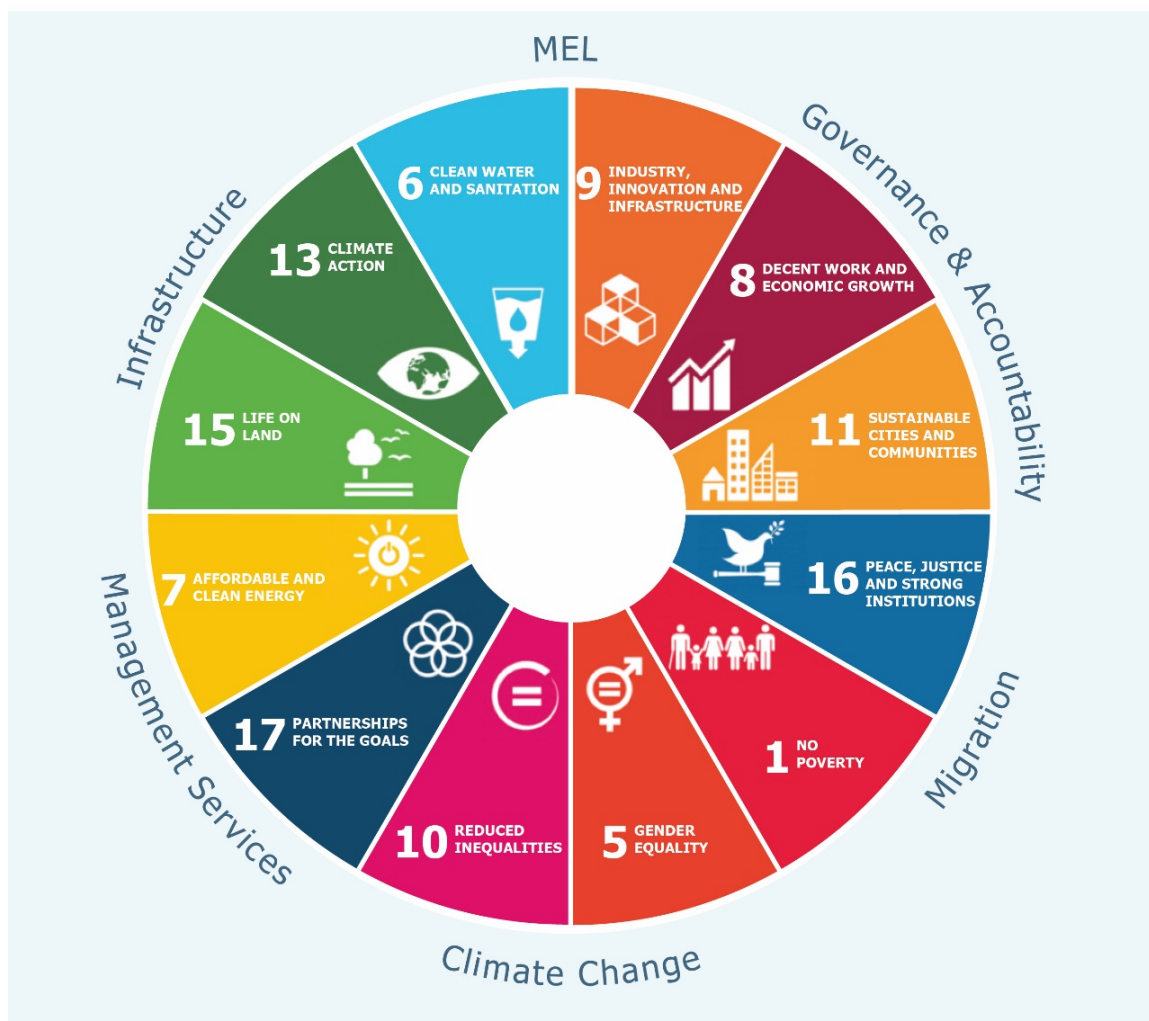
Internal Controls

WYG has a clearly articulated *Commercial Development and Operating Process* (CDOP), which is a framework for governance decision making and project management. We believe that a robust CDOP is essential for a professional services firm with multiple professional disciplines and markets such as ours, because it helps us to mitigate risk thereby creating sustainable profits and cash to reinvest in the business, our people and to create value for our shareholders.

The executive directors of WYG PLC also comprise its Investment Committee. The purpose of the Investment Committee is to:

- ensure a strategic view is maintained of any consents requested from WYG's main Board
- review and challenge any matters reserved for the approval of the main Board or the Investment Committee itself including:
 - major bids
 - where WYG PLC Board approval is required, make recommendations to the Board
 - other out-of-budget investment proposals
 - ensure that effective governance arrangements are in place throughout the Group.

The Sustainable Development Goals and WYG International's New Strategy



Indicative examples of project work helping to deliver the SDGs:

Climate Resilient Infrastructure Development Facility (CRIDF) Phase II

CRIDF II implementation is based upon several principles of operation which combine robust technical inputs with sensitivity to stakeholders' needs and an articulated pro-poor agenda. It will,

- Consolidate the knowledge and experience built up across the region in CRIDF I and use this as a robust platform from which to accelerate the process of mutual learning and ensure wider application of effective practices and experiences;
- Ensure that the CRIDF II investments are effectively leveraged;
- Develop innovation in projects for more efficient and effective applications;
- Promote and embed CRIDF pro-poor approaches to infrastructure investments across a wide range of government policymakers and implementers in the region.

CRIDF supports any action or project at regional, national, sub-national, or local level that better enables people – **particularly the poor and disadvantaged including women** – to predict, manage, or mitigate the impacts of extreme climate events through infrastructure interventions. Climate resilience is about building the capacity to cope with these climate extremes, whether they are due to the existing natural

climate variability or rather exacerbated by shifting climate patterns. n;

State Partnership for Accountability Responsiveness and Capacity (SPARC) programme

WYG has championed the delivery of technical assistance on efficient and effective utilisation of public resources, towards better and more transparent service delivery and reducing poverty. We have managed the PFM component of the £62 million DFID-funded (SPARC) programme, advising ten Nigerian state governments on how to enhance their public finance systems in order to achieve the Millennium Development Goals.

The SPARC team was proactively promoting reform uptake in budgeting and planning, accounting and fiscal reporting, FMIS, debt management, revenue/tax, audit, public procurement and anti-corruption, keeping in mind that consultants can only advise, whilst the government needs to take ownership of the reform. Our innovative approach included demonstrating to the Nigerian government the tangible and practical benefits of aligning local PFM systems to international best practice. This approach helped inspire change and secure commitment. Examples include closing dormant government bank accounts, reconciliation of existing accounts, better debt management, elimination of “ghost workers” and ensuring debt relief gains are put towards poverty reduction.

The Migration Partners (MP) was originally a joint initiative of Altai, GOPA, VNG International and **WYG** who have come together as concerned Europeans with the intention of offering support to the EU and its member states as they seek to change the paradigm of migration as well as approach countries of origin, destination, or transit at local, national and regional level. Most recently, DRC has joined the Migration Partners offering additional expertise through its NGO perspective and its vast experience.

The Migration Partners initiative is unique and offers a fresh look at a complex field – we bring together premier European development consultancies having extensive experience in implementing projects that combat poverty and root causes of migration.

Western Balkans Investment Framework (WBIF) Infrastructure Projects Facilities, Western Balkans

The Western Balkans Investment Framework (WBIF) is a joint blending facility of the European Commission, participating Financial Institutions, bilateral donors and Western Balkans countries to deliver funding for strategic investment projects in beneficiary countries. The Framework was set up in 2009 to contribute to stability, reform and EU accession in the Western Balkans and enhance the harmonisation and cooperation in investments for the socio-economic development of the Western Balkans.

The overall objective of the Technical Assistance operation in candidate and potential candidate countries for EU membership is to support the preparation and implementation of priority infrastructure investment projects in the transport, environment (water and wastewater sectors included), energy and social infrastructure sectors of the beneficiaries, to be financed by a combination of grants and loans. Some examples of projects supported include:

- Preparation of Flood Hazard and Flood Risk Maps and Support to the PMU for Flood Risk Management, Bosnia and Herzegovina;
- TA for waste water and water supply in Montenegro;
- Education, Excellence and Equity Project and Rehabilitation of Tirana Schools – 2nd Phase, Albania;
- Project preparation Feasibility Studies for Waste Water Treatment Plants in Kosovo.

2. DESCRIPTION OF ACTIONS

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;

Principle 2: Businesses make sure that they are not complicit in human rights abuses.

As an international business, our people are expected to be aware of, and give proper consideration to, all cultures and economic groupings including disadvantaged and vulnerable adults and children. We seek to comply with the laws and regulations of the countries in which we operate and, in response to recent concerns in the international development sector, we have drawn up a safeguarding policy.

We continue to seek closer engagement with our suppliers so that together we can reduce the impact of our supply chain on the environment, particularly with regards to travel, transport and office products. We aim to work with suppliers who are also environmentally aware and can demonstrate sustainable practices. We manage this through a careful selection process as part of which our suppliers must complete an evidence-based prequalification questionnaire. We check some of the answers independently and audit suppliers periodically.

WYG are aware of the concerns about sexual exploitation and abuse in the aid sector and have policies and processes in place.

In general, it is very unusual for our staff or subcontractors in the aid sector to come directly into contact with the ultimate beneficiaries of our work, since the overwhelming majority of our work comprises high-level consultancy advice provided to the primary beneficiary – usually a state department or agency. Nevertheless, we recognise there is a risk that we do come into contact with children and other vulnerable groups and also that staff and associates may, when off duty, behave in a way that would give cause for concern. Therefore, our Group Ethics policy expressly commits to promoting a culture of zero-tolerance towards any form of harassment, exploitation, discrimination or abuse.

By way of assuring our commitment to providing leadership, systems and the proper culture needed to protect vulnerable people we have updated and made changes to some of our policies and practices and require similar assurances from organizations within our supply chain.

Progress in the last year

- We reviewed our due diligence processes for taking on new subcontractors as recently as 2016 (in the light of the Modern Slavery Act and other developments). We have also taken steps to further improve the quality of due diligence subscribing to third party due diligence databases we do on our supply chain. This includes reviewing and amending our supplier procurement process and recruiting new legal/compliance resource and capability to improve the breadth and depth of our due diligence process.
- We have for several years provided all employees and many subcontractors with specific Hostile-Environment Awareness Training (HEAT), which covers a broad range of topics including some aspects of safeguarding. We have re-written and expanded this section of our training to cover safeguarding and the first course with this new material was run in March 2018.
- We are preparing a *Safeguarding Impact Assessment* tool to assist project managers when they consider whether there could be any safeguarding aspect to their projects and, if there are, to help them develop strategies on specific controls to seek to eliminate such risks.
- We have in place a *Whistleblowing Charter*. As part of a wider ethics-themed campaign of communications covering, among other things, professional standards and anti-bribery and corruption, we re-issued guidance to all employees explaining how to raise concerns generally, where to find

guidance, and how to report concerns within the confidential, protected framework provided by whistleblowing legislation.

- In the light of recent events, the WYG plc board has reviewed and agreed amendments to our Ethics Policy, specifically to reference our commitment to prevent exploitation, harassment and abuse.
- We have also instigated a review to identify any instances we can where issues in relation to sexual exploitation or abuse may have been raised. If, after investigation, we have anything to report in this regard we will, if appropriate, refer any concerns to the relevant authorities.

Policies in place:

- WYG Safeguarding Policy
- Dignity at Work Policy (also included within the WYG Employee Handbook)
- WYG Group Ethics Policy
- WYG Group Whistleblowing Charter

Labour

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.

Modern Slavery Act 2015 - WYG Slavery and Human Trafficking Statement 2018

WYG plc and its subsidiaries (WYG) acknowledge that slavery and human trafficking represent gross violations of fundamental human rights. WYG fully supports the implementation of the Modern Slavery Act 2015 and seeks to operate in such a manner as to ensure, so far as possible, that slavery and human trafficking do not take place within our business or supply chains. We recognise the importance of transparency in our approach to tackling these issues and expect the same high standards to be held by our contractors, suppliers and business partners.

WYG's Structure, Business and Supply Chains

As an international programme, project management and technical consultancy with a turnover of more than £150m, WYG comprises a number of limited UK and international companies. Due to the nature of our national and international development business, WYG's supply chains consist primarily of other professional service providers whose employees have qualifications education and skills that are unlikely to be exploited through forced labour. We assess the risk of modern slavery and human trafficking occurring in our business to be low but we recognise that no organisation can consider itself immune or afford to be complacent.

Our Policies on Slavery and Human Trafficking

WYG is committed to operating all aspects of our business in an ethical manner. Our *Ethics Policy* directly references our *zero-tolerance* stance on slavery and human trafficking. Our *Whistleblowing Charter* also confirms that incidents and/or suspicions related to slavery or human trafficking must be reported. These and other relevant policies are reviewed annually and published on our intranet to ensure wide distribution. They are also part of our compulsory induction process for new employees.

Assessing and Managing Risk

Our risk management processes seek to ensure that particular areas of risk in our business and supply chains are identified and impact assessments undertaken prior to the commencement of projects. In cases where a specific ethical concern has been raised, the ethical issues, including any related to slavery and human trafficking, will be referred to and considered by our Ethics Committee prior to the approval of project work.

Training

Given WYG's limited risk exposure and our enhanced due diligence and other processes in place, we have decided not to implement general training in modern slavery and human trafficking at this stage. However, in circumstances where we consider there may be particularly high risks, appropriate training will be developed and targeted at those personnel who may have direct exposure. WYG's Ethics Committee will review this stance periodically.

Gender Pay Gap Statement

Our aim is that our workforce will be representative of all sections of society and that each employee feels respected and able to give their best. We believe that diversity helps us to deliver a better overall service to our clients. WYG is also committed to providing equality and fairness for all in our employment and not discriminating on the grounds of gender, gender reassignment, marital status (including civil partnerships), race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age. In April 2018, we published our gender pay gap data in line with Government requirements. The results can be found on the Government website: <https://gender-pay-gap.service.gov.uk/>

Performance and Reward

At WYG, we recognise that our people are our greatest asset and that, by providing them with the opportunities and support to continue their development, we can ensure that they have the knowledge, skills and experience necessary to perform their roles to the highest standards; and in turn feel a real sense of job satisfaction and achievement.

Training and continuing professional development are essential to maintaining professional standards and meeting client needs and expectations. To support our commitment to learning and development an online e-learning portal, (the Learning Academy) has been developed to provide our people with easy access to learning and development. This is a central repository for locating all learning and development related documents, processes, products and solutions, including courses.

Learning and development needs will be identified through our formal annual HR appraisal process and documented in colleagues Personal Development Plans. Learning plans at a corporate and divisional level are identified as part of the annual business planning process.

The HR team provides support to the business on all HR matters including employee relations, performance management, succession planning, learning and development, recruitment and rewards.

Social Value and Community Engagement

At WYG, we are committed to the social value agenda and we are proud of our efforts and achievements in this regard. This is demonstrated by the range and scale of activities we undertake to ensure we have a positive social impact on our communities. We provide our people with up to three volunteering days per annum to support charities and worthy causes.

Progress in the last year

We have supported a number of initiatives to begin to address the gender imbalance. These have included the appointment of Marcia Marini as a Non-Executive Director of WYG PLC and incorporating unconscious bias training into our graduate development programmes with the intention of extending this to all hiring managers. We are also supporting women with ambition to become leaders through membership of the Women in Leadership Association (WLA). This not only gives access to useful resources and networking, but also allows for a number of our female staff to become part of their mentoring programme. We also have flexible working options to help our staff to balance their personal commitments with their work commitments and a number of flexible benefits that enable all of our staff to tailor their benefits choices to their lifestyle.

Modern Slavery Statement information published and processes implemented:

Due Diligence processes for Slavery and Human Trafficking: Before they can start any work for WYG or on our behalf, our national and international suppliers are subject to strict checks to assess their compliance and suitability. Our Supplier Information Form and Pre-Qualification Questionnaires now directly enquire as to whether such organisations are covered by the Modern Slavery Act 2015 and, if they are, require them to provide a copy of their slavery and human trafficking statement pursuant to section 54(1). If they are not subject to the provisions of the Act, suppliers are required to provide details of their Modern Slavery Policy (or equivalent documents), any training or education offered, and any due diligence processes they operate. The information received is scrutinised and further investigation taken where necessary.

Policies in place:

- Ethics Policy
- Recruitment Policy,
- Dignity at Work,
- WYG Employee Handbook,
- Whistleblowing Charter

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility; and

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

WYG have been certified for ISO 14001 for 17 years, being one of the first consultancies to successfully gain accreditation. We successfully transitioned to the new standard ISO 14001:2015 in September 2017.

Our Environmental Management System (EMS) is reviewed externally by our third-party accreditation provider, DNV GL Business Assurance UK Limited, twice a year and we are subject to re-certification every three years. Over the last three years we have not had any major findings recorded at external or internal audit on the EMS. At the last external audit, the Lead Auditor commented that our systems are very good heading towards exemplar when compared to our peer group. We hold the following accreditations with DNV GL:

- OHSAS 18001:2007 Occupational Health and Safety Management Systems
- BS EN ISO 14001:2015 Environmental Management Systems
- BS EN ISO 9001:2015 Quality Management Systems

Central to our ISO14001 accreditation is our environmental aspects and impacts (A&Is) which are reviewed no less than annually to make sure those significant to our business are current and our corporate controls are appropriate. We carry out a comprehensive A&I identification process for both office and project level with significant environmental A&Is controlled through procedures, and improvement driven through setting and review of measurable objectives and targets.

We have a number of environmental related policies and processes in place. These are integrated with the whole Safety, Health Environment and Quality (SHEQ) management system and the CDOP process. For example, one Procurement Policy includes a statement related to ethical purchasing. We also have a Corporate Responsibility (CR) Committee chaired by the company secretary.

WYG bears a new independent stamp of approval; the Institute of Environmental Management & Assessment's (IEMA) Environmental Impact Assessment (EIA) Quality Mark.

We were one of IEMA's Corporate EIA Registrants. However, we transitioned over to the new EIA Quality Mark scheme as this format places the correct emphasis on sharing, learning and improving EIA practice.

Progress in the last year

We measure our carbon footprint using the World Resources Institute's GHG Protocol Tools, the methodology used for the ESOS Regulations and most applicable to our operations. Energy consumption is based on billed Kwh usage of gas and electricity within our offices, oil consumption is measured in litres and water consumption on billed cubic metres used. Transport data is taken from business mileage expense claims and fuel card data which provides total litres consumed. Public transport relates to mileage by train.

We continue to make a significant effort to make energy savings and emissions reductions through the individual office energy management plans introduced in 2011/12 and updated in 2015.

Our SHEQ department are responsible for keeping this data up-to-date on a six-monthly basis and in line with the latest UK Department for Environment, Family and Rural Affairs (DEFRA) carbon conversion factors. Carbon accounting and carbon management form an integral part of our ISO 14001 compliance and Corporate Social Responsibility.

We publicly report our findings in the Group Annual Report and Accounts.

Policies in place:

- Group Environmental and Energy Policy

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- Environment and Energy 5-year Action Plan
 - Efficient Use of Resources Procedure
 - Waste Checklist
 - Project Waste Management Guidance

Anti-Corruption

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

Professional standards & behaviour

Behaving ethically is at the heart of what it means to be a professional; it distinguishes professionals from others in the marketplace. At WYG, we are committed to operating all aspects of our business in an ethical manner.

WYG publishes numerous communications on The Source, our internal intranet which can be accessed by all staff - which, taken together, seek to raise our collective conscience in relation to doing business ethically. These includes making a Gifts and Hospitality Policy available via The Source with register and associated guidance, with a new suite of anti-bribery training and guidance.

Progress in the last year

In line with our commitment to engendering an ethical culture and developing and maintaining procedures to tackle the risks associated with bribery and unethical behaviour, we have recently been reviewing and updating our policies and guidance on these issues. The latest versions of these are now available in the Company Policies and Procedures library on The Source and we have also developed a new **Anti-Bribery and Corruption (ABC) training module** which all employees must complete.

This training module has been designed to provide an introduction to the risks one may face, to WYG's policies and procedures relating to bribery, and to the UK Bribery Act. Undertaking this base level of training is a mandatory requirement for all individuals working for WYG, including direct employees, consultants and sub-contractors. For those employees whose work exposes them to greater risk, a more advanced online training module is available once the standard training has been completed.

The ABC training module can be accessed through our new e-learning platform at <https://wyglearning.com>.

The ABC training aims to provide employees with the tools and knowledge to minimise your exposure to any risk of bribery or corruption. This, in turn, reduces the Group's risk profile, supports its commitment to good corporate governance, and promotes an ethical approach in all aspects of our business.

In-depth due diligence undertaken on partners using World Check software and the WYG Supplier Information Form, we have employed a colleague whose specific function is to ensure that all partner due diligence is complete and up to date, and they are currently working on developing a supplier due diligence on-line tool. In the past year, we have recruited a qualified lawyer as our international compliance officer with sole responsibility for third party due diligence.

Policies in place:

- UK Bribery Act 2010 – Guidance Note,
- Our Approach to Ethical Business,
- Ethics Policy,
- Fraud Policy,
- Commercial Development and Operations Process (CDOP),
- Whistleblowing Policy,
- Conflict of Interest Guidance

Measurement of Outcomes

Human Rights

WYG has not received any reports of incidents of human rights abuses or infringements within the past year.

Labour

There have been no incidents of discrimination, forced or compulsory labour within WYG within the last year.

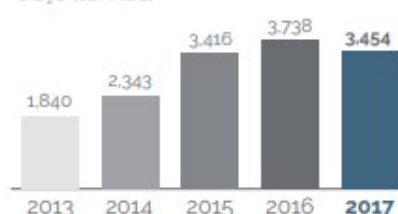
Environment

As per our published Annual Report and Accounts 2018:

TABLE 1: CO₂E (TONNES) EMISSIONS BREAKDOWN BY METHOD³

UK utilities	2017	556.06
	2016	747.94
	2015	875.1
	2014	851.63
	2013	601.66
Overseas utilities ^{2, 5, 6}	2017	0.26
	2016	1.5
	2015	31.18
	2014	1.30
	2013	0.00
Fuel cards ⁴	2017	273.36
	2016	605.80
	2015	254.72
	2014	578.72
	2013	440.60
Cars and vans	2017	1,098.03
	2016	971.04
	2015	959.14
	2014	830.86
	2013	722.34
Public transport ^{1, 2}	2017	1,526.52
	2016	1,416.66
	2015	1,295.39
	2014	80.72
	2013	75.24

TOTAL EMISSIONS
CO₂e (tonnes)



¹ Public transport is the mileage from journeys by train (including London underground and metros) and air travel (domestic, shorthaul and longhaul).

² No air travel or overseas utilities data is available for 2013

³ Realigned to calendar year for better reporting in line with CDP reporting

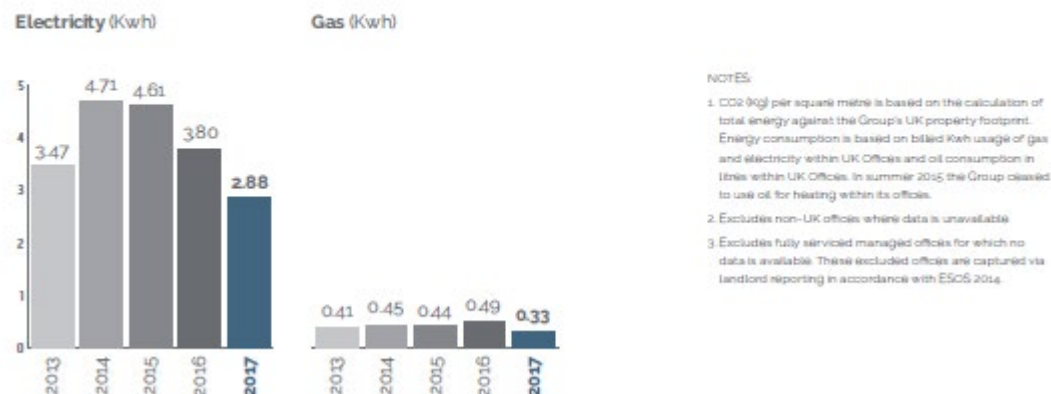
⁴ Fuel card usage was lower in 2014 due to the changeover in the supplier of pool vehicles. Mileage was captured during the temporary use of hire vehicles. Fuel card usage increased again in 2016 but reduced in 2017 as fuel cards were restricted to pool vehicles only.

⁵ There was an increase in overseas utilities reported in 2015 but we moved into fully serviced offices from 2016 meaning that usage returned to its previously low levels.

⁶ UK Utilities is the combination of electricity, gas and oil and overseas utilities is electricity only.

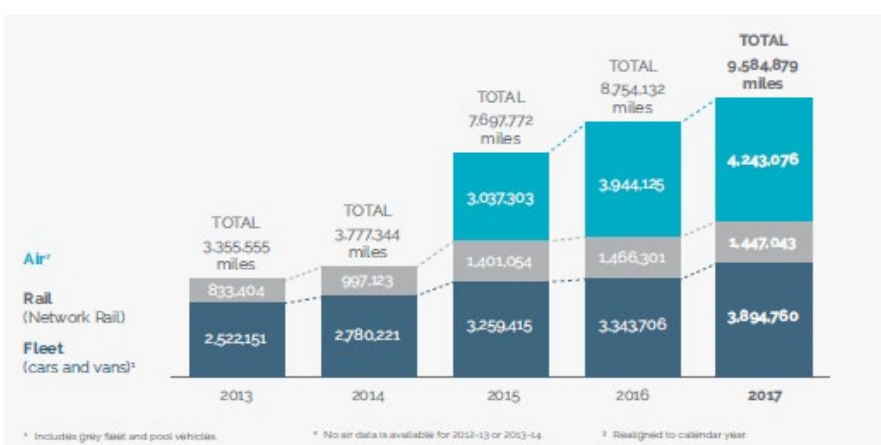
⁷ Excludes fully serviced managed offices for which no data is available. These excluded offices are captured via landlord reporting in accordance with ESOS 2014.

**TABLE 2: TOTAL CONSUMPTION (CO₂e (KG) per m²)
PER FUEL USED IN UK OFFICES**



Business Mileage by Method -

With an expanding business and international geographical footprint, our business mileage per person has increased during the year. Nevertheless, through our investment in better technology, greater use of that technology for meetings and placing greater emphasis on the importance of controlling costs and reducing our impact on the environment we continue to bear down on travel and travel costs.



Anti-Corruption

The WYG plc Audit Committee monitors the effectiveness and reviews the implementation of our UK Bribery Act 2010 – Guidance Note, regularly considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

There have been no legal cases or rulings related to corruption and bribery.