



21st March 2019

UN Global Compact

Communication on Progress 2019

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Statement from ICF Consulting Services Limited.

I am pleased to confirm that ICF Consulting Services Ltd (ICF) continues to support the Ten Principles of the United Nations Global Compact regarding human rights, labour, environment and anti-corruption.

With this Communication on Progress, we express our continuing intent to implement those principles. We are committed to making the UN Global Compact and its Principles as part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects that advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

In addition to the information within this Communication on Progress, further information is available at <https://www.icf.com>

Yours Sincerely



Michael Sands
Vice President and
Company Secretary

21st March 2018

Human Rights

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

ICF supports and respects the protection of internationally proclaimed human rights in both its internal business activities and its external activities, including through many of the services provided to our clients and the interactions we have with stakeholders.

ICF maintains comprehensive policies and practices that promote a positive and safe working environment and ensure that all employees abide by relevant international laws, including human rights legislation. To support these policies, ICF implements induction training and, as appropriate, annual training to ensure all employees are aware of, and abide by, such policies and legislation. Each ICF Group company, including ICF Consulting Services Ltd, has its own location-specific Employee Handbook outlining company policies and expectations of ICF employees. ICF policies include but are not limited to:

- Inclusive and Equal Opportunities
- Dignity at Work (including Bullying and Harassment)
- Recruitment Policy
- Security Checking procedure
- Disclosure and Barring Checks
- Working with Children, Young and Vulnerable People
- Safety and Security
- Safeguarding
- Code of Conduct

Many of the projects that ICF undertakes support the rights of humans around the world. In one example of such a project, ICF identified cases of discrimination on the grounds of gender, ethnicity, religion or belief, age, sexual orientation, and disability in various policy areas. We also evaluated the effectiveness of laws, policies and programmes to eliminate discrimination in education, employment and health and developed recommendations for the fair treatment of vulnerable groups in the European Union (EU).

ICF continually reviews its Safety and Security policies and practices to identify areas of improvement. ICF has recently appointed a dedicated Safety & Security Manager and are in the process of implementing PAS 3001:2016.

In the context of the development of a research ethics policy, we will review and where necessary strengthen our processes engaging with vulnerable groups, including children and young people.

Labour

- **Principle 3.** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- **Principle 4.** Businesses should uphold the elimination of all forms of forced and compulsory labour.
- **Principle 5.** Businesses should uphold the effective abolition of child labour.
- **Principle 6.** Businesses should uphold the elimination of discrimination in respect of employment and occupation.

ICF is dedicated to providing a safe and inclusive working environment for its employees and abides by the above principles within its offices and working practices. Furthermore, ICF undertakes many projects where human rights and labour law interests are at the core of the project.

ICF requires that all third parties, (including contractors, subcontractors, agents and brokers) agree to suitable undertakings, including the acceptance of relevant policies that support ICF's activities and conduct in relation to the principles above.

Each ICF office has its own location specific Employee Handbook which is presented to all new employees, and remains available throughout the duration of employment, for their awareness and reference. The Employee Handbook details all relevant policies and rights of the employee, including matters such as collective bargaining, labour laws, company policies and expectations on conduct. ICF policies include but not limited to:

- Employee Handbook
- Inclusive and Equal Opportunities
- Dignity at Work (including Bullying and Harassment)
- Recruitment Policy
- Working with Children, Young and Vulnerable People
- Safeguarding
- Whistleblowing
- Code of Conduct
- ICF Statement and Plan on Human Trafficking and modern Slavery (<https://www.icf.com/company/ethics-and-compliance>)

As part of ICF's development of its research ethics policy, we will review and where necessary strengthen our processes relating to engaging with vulnerable groups, including children and young people.

Following the implementation of our Safeguarding Policy, awareness training of this policy will be provided as required.

Environment

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

ICF is committed to undertaking its business activities in a manner that supports the protection of our immediate and the global environment. ICF offers environmental expertise to its clients, as such, we have in-house expertise to inform our working practices and conditions to ensure that we consider the effects upon the environment. To support our commitment to environmental challenges ICF has maintained ISO14001 since 2012. Environmental management systems provide practical tools to help identify and control our impact on the environment and to improve our environmental performance. The ICF Group has maintained a net-zero carbon footprint since 2006.

ICF maintains the following policies and certification to support our environmental commitments:

- Environmental Stewardship Policy
- Global travel Policy
- ISO14001 Environmental management

Through specific client projects, ICF provides technical and economic assistance to clients on issues involving the improvement of sustainable use of energy and climate change mitigation and adaptation. Through these Projects ICF supports sustainable energy programme management, energy and climate policy analysis, monitoring and evaluation of energy use and energy efficiency auditing, reporting and strategy recommendations.

ICF is continually looking for ways to reduce its impact on the environment. New technologies, such as shared global IT platforms and improved communications systems have reduced the need for travelling to meetings in person, further reducing our carbon footprint.

More information on our environmental performance can be found in our Citizenship Report located [here](#).

Anti-Corruption

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

ICF requires the highest standards from its employees and business partners in all matters related to anti-corruption and/or bribery. We seek to build and sustain trust with our clients, shareholders, business partners, and among our employees. To support this we have designed our Compliance and Ethics Program so that we can fulfil our commitment to build trust and integrity. To promote compliance with ICF's Code of Business Ethics and Conduct and all applicable laws, ICF operates a Compliance and Ethics Program for all ICF employees. This includes appropriate policies and training. ICF implements induction training and, as appropriate, annual training to ensure all employees are aware of, and abide by, such policies.

In accordance with ICF's code of conduct and the company's compliance with the UK Bribery Act 2010, ICF is compelled to obtain an undertaking from all third parties, (including contractors, subcontractors, agents and brokers), that they have no conflicts of interest (related-party relationship), have received and read ICF's Anti-Fraud and Corruption Policy Statement and understand that ICF has a zero-tolerance policy towards any illegal or unethical activity, including fraud and corruption.

The ICF Compliance Committee oversees the program, with day-to-day responsibility given to each respective member of the Compliance Committee and to the Chief Ethics & Compliance Officer (CECO) to coordinate activities. The purposes of the program includes to:

- Maintain and create awareness of our Code of Business Ethics and Conduct
- Promote a company culture that encourages ethical conduct.
- Establish standards and procedures to prevent and discover improper conduct.
- Deter improper conduct by ensuring corrective measures.
- Monitor ICF's anonymous, third-party Ethics Hotline to facilitate employee communication.

ICF policies include but are not limited to:

- Anti-Bribery and Corruption (Employee Handbook)
- Anti-Corruption Policy
- ICF Code of business Ethics and Conduct
- Whistleblowing

More information is available at:

- [Our Code of Conduct](#)
- [Ethics Hotline Information](#)

Further Information

Further information is available at www.icf.com

Or contact:

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