

A light gray world map serves as the background. It is overlaid with a pattern of semi-transparent squares in various shades of gray and blue. Three blue location pins are placed on the map: one in North America, one in Europe, and one in Asia.

Compliance Solutions

Compliance Solutions provides IT solutions
and consulting services across the entire spectrum
of corporate compliance needs

Reporting period of the Progress Report (COP)

From: 15.03.2018 To: 15.03.2019

1. DECLARATION OF CONTINUOUS SUPPORT

To our stakeholders:

I am pleased to confirm that Compliance Solutions GmbH reaffirms its support for the ten principles of the United Nations Global Compact in the areas of human rights, labor standards, environmental protection, anti-corruption and data protection.

In this annual progress report, we describe our measures to continuously improve the integration of the Global Compact and its principles into our business strategy, corporate culture and daily operations. We also undertake to share this information with our stakeholders through our primary communication channels.

Yours sincerely

Dr Roman Zagrosek, LL. M. (Berkeley) / CEO/General Manager

Date: 11.03.2019

The Company

Compliance Solutions GmbH is a specialist for the competent and reliable handling of compliance requirements. Our customers receive turnkey standard solutions from us, which can be flexibly adapted, integrated into the corporate landscape and continuously further developed through the use of our Modular Compliance Solution (MCS).

Our compliance platform includes standard solutions for business partner due diligence, permanent screening & monitoring, compliance risk management, self-assessments, whistleblowing systems, compliance case management, competition contact registers, continuous controls monitoring, data protection and much more...



A sophisticated monitoring and reporting system as well as a clear and secure user administration of the compliance platform is available for all solutions.

As a long-term partner, we support our customers in achieving the "Gold Standard" in compliance and integrity.

Human Rights

Compliance Solutions GmbH respects international human rights and is committed to their implementation and compliance in all our spheres of influence. All employees are obliged to confirm their respect for human rights by signing the Ten Principles.

Measures:

- Maintaining and communicating the Code of Conduct.
- Explanation of the Code of Conduct on hiring and commitment by signature.
- The ethical guidelines clarify desired and intolerable behaviour. Violations are reported to the Compliance Officer.
- Information is provided on types and forms of discrimination in the workplace. Employees can turn to a trusted third party and report discrimination or bullying.
- Training in occupational health and safety and measurement of accidents at work and sick days.
- Ensure that workers are provided with safe, adequate and sanitary facilities in the workplace.
- Protect employees from harassment in the workplace, including physical, verbal, sexual or psychological harassment, abuse or threats.
- The Code of Conduct is communicated to business partners and suppliers and compliance with it is checked and demanded.
- Certification according to ISO 27001 including the right to privacy and data protection.
- Training in accordance with the principles of the Basic Data Protection Regulation, which entered into force on 25.5.2018.

Measurement of the results:

- There were no violations of human rights during the reporting period.
- The number of sick days per employee has remained constant at a low level.
- There were no reported cases of discrimination or harassment.

Labour Standards

Compliance Solutions GmbH undertakes to comply with the core labour standards of the International Labour Organization (ILO) in the world of work. The company works actively to promote social justice and human and labour rights to the best of its ability. Our business partners are informed about our guidelines and standards and compliance is required.

Measures:

- Maintaining and communicating the Code of Conduct
- Regular staff appraisals and measurement of employee satisfaction and fluctuation rate
- Ensuring that the company does not engage in any form of forced labour
- Compliance with minimum wage standards and the "equal work, equal pay" guideline
- Relevant and objective criteria were defined and complied with in employment-related decisions
- Offering training courses
- Promotion of women in IT

Measurement of the results:

- Employee satisfaction is at a constantly high level.
- There were no accidents at work and no cases of misconduct on the part of business partners and suppliers.
- Increased diversity level through hiring of several female IT specialists.

Environmental Protection

Protecting the environment is an important part of our corporate policy. We regularly check the processes relevant to the environment and energy and identify potential for improvement.

Measures:

- We use 100% renewable energy for our sites and data centers.
- Energy efficiency is an important criterion in the procurement of equipment.
- At our sites, suitable storage facilities are available to separate waste, dispose of it correctly or, if possible, recycle it.
- Our locations are equipped with intelligent heating systems and these are set to be energy-efficient.
- Emergency procedures for the protection of human health and the environment are established, communicated and regularly simulated.

Measurement of the results:

- Share of renewable energies in electricity consumption: 100%.
- Newly purchased appliances have very high energy efficiency.
- There were no emergencies regarding human health and the environment.
- Simulated emergency procedures were carried out twice during the reporting period in accordance with general principles.

Fight Against Corruption / Data Protection

The trust of our customers and stakeholders is of central importance for Compliance Solutions. We must do everything we can to maintain that trust. Strict compliance with all laws and regulations is extremely important for this.

This is due not only to our efforts to comply with the law, but also to our conviction that we will maintain the reputation of Compliance Solutions and to our commitment to conduct our business fairly, honestly and openly in accordance with the highest possible ethical standards.

For Compliance Solutions and its employees, corruption means the risk of criminal prosecution, fines, exclusion from bidding procedures and other sanctions. It contradicts everything that we and our brand stand for.

Compliance Solutions therefore pursues a zero tolerance policy with regard to bribery and corruption. This clear position is represented by the entire management of Compliance Solutions.

The management of Compliance Solutions is fully committed to this principle. Together, we must ensure that the reputation of Compliance Solutions remains very good.

Moreover, Compliance Solutions is committed to data protection. We protect our data and our customers' data with all our efforts.

Measures:

- A risk management system has been established and is regularly reviewed for effectiveness. Critical processes were identified and measures derived.
- Compliance and information security management officers have been appointed and have the full support of management.
- Our company was successfully re-certified according to ISO 27001 in December 2018 by TÜEV Rheinland.
- Implementation of further regular audits.
- Business partners and suppliers are obliged to comply with our high standards.
- The anti-corruption guideline is regularly communicated within the company. The risk exposure of processes, departments and employees is reviewed and training is provided.
- The Code of Conduct is regularly communicated within the company. The risk exposure of processes, departments and employees is reviewed and training is provided.
- The section on conflicts of interest was communicated.
- The section on public officials was communicated.
- Gift & entertainment policy has been communicated.
- Employees are obliged to report irregularities immediately.
No disadvantages arise for whistleblowers due to their information.
- Accounting and financial records are kept in a transparent and orderly manner.

Measurement of the results:

- No cases of corruption or data breaches have occurred
- The anti-corruption and data protection policies were understood by all employees. Understanding has been tested.

- Successful re-certification according to ISO 27001 in December 2018.