



WS Insight Ltd - Communication on Progress

Statement of the CEO

1st May 2019

To our stakeholders:

I am pleased to confirm that WS Insight Limited reaffirms its 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. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Ashton Towler,

CEO

1. Human Rights

Assessment, policy and goals

WS Insight is an active member of the International Code of Conduct for Private Security Companies (ICoCA). Consequent to this membership is its full support of the Universal Declaration of Human Rights as demonstrated by the documented Human Rights policy and Code of Conduct for Staffs and Employees.

The company has established and documented the Ethical Conduct Policy, Diversity Policy, Workplace Policy on HIV/AIDS, Whistle-blower Policy, Alcohol & Drug Abuse Policy among other staff focused guidelines.

The ideals within these policies are ingrained in the company's workforce through inclusion in the formal Guard Basic Course as well as communication through internal company documents and the company website, as far as is applicable.

Implementation

Internally, the HR Department drives the implementation of the policies through the entity and department heads. Externally the Logistics department for instance carries out supplier evaluation in which ethical conduct is a key component of the assessment.

The Quality Management System certification ISO 9001:2015 now implemented across all the operational entities of WS Insight has mainstreamed risk-based management of the company's operations. In addition



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Human Rights Risk Assessment is now a core part of the planning process by the entities, which is a requirement for compliance to ISO 18788 and membership of ICoCA.

A specific whistle-blower confidential line and email address are set-up and maintained and are fully available to all staffs.

The ongoing implementation of the malaria safe initiative is designed to benefit staffs and their families. The Head of Sustainability is responsible for the protection of Human Rights within the company.

Performance Monitoring & Evaluation

The Company has documented processes that outline the indicators which can be used to measure achievement of its goals.

On a monthly basis, the entities produce performance data which demonstrates progress within the month. Incidents of Human Rights violation are captured within these metrics and trends are closely monitored for corrective action. The company is looking to move into real-time internet-based monitoring of such metrics with a view to enable immediate response to any instances of Human Rights violation.

There have been no incidents of human rights abuses associated with the company during the reporting year, and no complaints or grievances lodged.

Monitoring and evaluation will continue under the transition of process to align with PSC1 and ISO 18788 which is being undertaken across the group.

2. Labour

WS Insight Ltd fully supports the core conventions of the International Labour Organisation (ILO) and the relevant labour legislation in all of its operating countries. Furthermore, WS Insight is registered with the local OHSE organs in each country and operates management systems in accordance with internationally recognised standards (OHSAS 18001).

Insight operates a comprehensive human resources department and maintains policies clearly stating employee rights and responsibilities, compensation and benefits. Alongside a detailed HR operating manual, employees are issued with an employee handbook outlining their rights and responsibilities, including code of conduct, terms and conditions of employment, benefits, disciplinary procedures, performance reviews and the company grievance procedure.

WS Insight operates a comprehensive risk management system which falls under obligations to ICoCA and compliance with PSC.1 and ISO 18788. Labour related risks are considered and mitigated within this framework.

Implementation



Insight maintains a comprehensive and process driven grievance policy with oversight from the International Code of Conduct (ICoCA). The grievance process is confidential, and available at company offices and for download from the company web-site. Insight also maintains a Whistle Blower policy driven via a confidential phone line and email address.

Labour and related policies form an integral part of basic and refresher training. Continuation training is maintained and strengthened via country welfare officers, supervisors, and also a mentoring programme.

Insight acknowledges its duty of care towards staff and employees (and all those who may be affected by its operations) and maintains Health & Safety policies and procedures in accordance with OHSAS 18001 to which it is independently certified.

Insight maintains a policy on diversity in the workplace and endeavours to promote this policy through communication, awareness, management and training.

The Company regularly consults and communicates with employees and staff through internal messaging, a staff journal and through social media platforms. Structured supervisory and mentorship programs allow for a free flow of communication both up and down the employment chain. Insight maintains a process of visually felt leadership which provides documented welfare and pastoral care.

Insight maintains a dedicated recruitment and selection process that ensures all applicants are above the legal age of 18 years old, and are not discriminated against based on age, religion, race, or gender.

Insight maintains a structured Human Resources department which is directed at group level and administered in-country. The Company's labour policies fall under external third-party scrutiny of the ICoCA.

Measurement of outcomes

The company compiles and monitors performance by comprehensive monthly outputs across the group which are reviewed and assessed by the group executive team. Such statistics include, but are not limited to: diversity ratios, sickness returns, accident analysis, complaints and grievances, labour cases, supervisory interaction, mentorship, staff retention, health & safety returns and staff appraisals.

Any violations of the Global Compact Labour principals would be subject to a clearly defined investigation process, although to date there have been no incidents that have warranted said action.

All related outputs are reviewed monthly by the group executive team, and policy and processes subject to annual management review, which is documented under the requirements of our aforementioned certified standards which are subject to independent scrutiny by the company's certifying body and ICoCA certification and monitoring arms.



3. Environment

Assessment, policy and goals

WS Insight supports a precautionary approach to environmental challenges and undertakes initiatives to promote greater environmental responsibility. The company encourages the development and diffusion of environmentally friendly practices.

Insight maintains an environmental policy and aligns its practices in accordance with ISO 14001 alongside existing quality and health & safety management systems.

An annual risk assessment demonstrates that the company's activities have a relatively minimal impact on the environment, however this does not diminish its responsibility in this area, and the company's endeavour to minimise its environmental footprint. Insight complies with all local environmental requirements, and those of clients and stakeholders with whom it interacts.

Implementation

Insight encourages workplace behaviour that promotes environmental stewardship and helps reduce energy consumption. Such steps include, but are not limited to:

- switching off lights, computers and air-conditioning when leaving offices or workstations
- effectively sealing the building envelope when using air-conditioning
- using double sided printing where practicable
- the proper disposal of waste (including batteries) and the use of re-cycling where possible
- the analysis of fleet fuel consumption, and the training in best practice driving techniques to promote fuel efficiency
- the insistence on suppliers that products and services are provided from sustainable sources
- communication and awareness training to all staff in the importance of environmental initiatives and practices
- progressing towards a more paperless work set-up in the day-to-day operations

The stewardship of the company environmental policy is the responsibility of the Head of Sustainability, and disseminated throughout the operation via a dedicated organisational structure

Measurement of Outcomes

The company carries out annual environmental risk analyses. To date there have been no incidents of non-compliance with ISO 14001 guidelines, and Insight has not been subject to any statutory notices.

The company has sustained the internal auditing of each entity against ISO 14001 as part of the QA/HSE audit round and the findings are reported appropriately, raising non-compliance if required, implementing mitigating action, and setting out an annual environmental plan for periodic evaluation and monitoring.

Incidents will be subject to appropriate investigation and mitigating action as part of the defined policy and accompanying processes.

4. Anti-corruption

Assessment, policy and goals

WS Insight is committed to maintaining the highest standards of honesty, openness and financial accountability. The Board considers all malpractice with the utmost priority, whether it may be committed by senior managers, staff, suppliers or contractors.

Insight has zero tolerance for corruption. Company policy prohibits bribes and facilitation payments of any kind and the company believes it is important for organisations to play a major role in identifying and eradicating corrupt business practices. It therefore supports the objectives of the UK Bribery Act passed in 2010, and the UN Convention Against Corruption. Whilst Insight believes its existing framework and the nature its business to uphold the law and protect clients from criminal activities of all kinds, embodies the core principals of the act and convention, the company maintains close vigilance on required measures and the adequacy of its existing approach.

The company maintains an Ethical Conduct Policy which is communicated throughout the operating entities, and available for download on the company web-site. Ethical conduct messaging is communicated across the group in the form of poster campaigns, an internal magazine and social media platforms. These give guidance on what action to take when confronted with extortion or bribery. The company maintains a whistle-blower mechanism in the form of a confidential phone line and email address.

Suppliers are obliged to undertake a comprehensive ethical conduct diligence process prior to entering into a contract.

The company is in the process of carrying out an ethical risk analysis as part of its overarching risk management protocols and obligations under its membership of ICoCA and compliance with associated standards PSC.1 and ISO 18788 and this will be completed in time for full certification to the said standards.

Implementation

As described herein the company maintains an Ethical Conduct Policy which is communicated throughout the operating entities, and available for download on the company web-site. Ethical conduct messaging is communicated across the group in the form of poster campaigns, an internal magazine and social media



platforms. These give guidance on what action to take when confronted with extortion or bribery. The company maintains a whistle-blower mechanism in the form of a confidential phone line and email address.

Further to this, ethical conduct is included in staff basic training as an individual module of the training syllabus. This is further strengthened by continuation and refresher training.

Suppliers are obliged to undertake a comprehensive ethical conduct diligence process prior to entering into a contract.

Any breach of the company's ethical conduct policy is investigated and where appropriate brought to the attention of the relevant authorities in the country of operation.

Insight is further subject to external third-party scrutiny by virtue of its membership and active participation with the International Code of Conduct (ICoCA) and its monitoring function.

The responsibility of the application of ethical conduct across the group lies with the company's Head of Sustainability, who sits on the group executive teams and reports to the board of directors.

Measurement of Outcomes

As previously mentioned the company investigates any incidents of corruption and appropriate action is determined by the board of directors.

The company maintains a full-time internal auditor, whose outcomes are regularly reviewed to ensure consistency with the company's anti-corruption commitment and its exposure to reputational risk.

To date there have been no allegations of corruption that have required investigation.

Insight has conducted an extensive internal ethical risk assessment to identify possible areas of weakness and implement appropriate mitigating action. Going forward, this will provide measurable platforms and targets for appropriate review.

