

JUNE 2019

# COMMUNICATION ON PROGRESS



**WE SUPPORT**



**PREPARED AND PRESENTED BY**

ADAM AINSWORTH CEO



## 1 INTRODUCTION

I am delighted to confirm that **SafeLane Global Limited (SafeLane)** 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, our first annual **Communication on Progress**, we describe our actions to integrate the Global Compact and its principles into our business strategy, culture and daily operations.

We will share this information with our stakeholders via our primary channels of communication.

Yours sincerely,  
**Adam Ainsworth**  
CEO



## ABOUT SAFELANE GLOBAL

SafeLane works with many partners - primarily to mitigate the risk of explosive threat; whether that's unexploded mines in the Falkland Islands, IEDs in Yemen, or unexploded bombs in post conflict countries including the UK and Germany. Its partners span the humanitarian, governmental and commercial sectors, and since inception in 1989, SafeLane has delivered over 20,000 projects in more than 60 countries - on land and in the marine environment,

At its heart, SafeLane is a people-centric organisation. Not only are its people the most important part of the company, but remediating contaminated environments to return them to communities globally is what underpins SafeLane's mission.

The concept of corporate social responsibility is therefore a central theme guiding the company's vision - and it is an integral part of SafeLane culture.

Becoming a participant in the United Nations Global Compact (UNGC) and pledging ongoing commitment to its principles was a natural path for SafeLane to take.

Today, every SafeLane staff member is an active supporter of the company's ongoing commitment to the UNGC - as we hope this communication on progress will show.

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# 2 HUMAN RIGHTS

## ASSESSMENT, POLICY AND GOALS



SafeLane is passionately committed to ensuring all staff maintain ethical standards of conduct at all times, and respect the rights of others. Further, it actively ensures it is in no way complicit in human rights abuses.

Its working practices and procedures ensure consistent and fair treatment for all within the organisation, and it encourages improvement where necessary.

SafeLane's commitment to Human Rights is documented in its codes of conduct as outlined in the Office Staff Handbook and Field Contractor Guidelines. These documents are supported by the Sexual Abuse and Exploitation Policy, Corporate Social Responsibility Policy and Slavery and Human Trafficking Policy. These are provided to everyone during induction; all staff are required to sign a commitment to upholding these policies' principles.

**ALL HUMAN BEINGS ARE BORN FREE AND EQUAL IN DIGNITY AND RIGHTS.**

**SAFELANE ACTIVELY SUPPORTS & RESPECTS THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS.**

**THROUGH POLICY AND PROCESS, IT ENSURES IT IS NOT COMPLICIT IN HUMAN RIGHTS ABUSES.**

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# IMPLEMENTATION

SafeLane has a zero-tolerance approach to modern slavery, human trafficking and sexual exploitation and abuse. Its procedures and policies are designed to protect staff from workplace harassment, including physical, verbal, sexual or psychological harassment, abuse or threats. In addition, it ensures workers are guaranteed safe, suitable and sanitary facilities.

All employees and those under the control of the company must read, understand and comply with all associated policies. SafeLane provides regular staff training and assessment in these critical areas..

The prevention, detection and reporting of human rights abuses in any area of the company business or supply chain is the responsibility of all those working for the company or under the control of the company. All are required to avoid any activity that could be interpreted as, or might lead to, a breach of these codes of conduct and policies.

# MEASUREMENT OF OUTCOMES

The Staff Handbook illustrates SafeLane's internal system and encourages a culture of openness and accountability which is essential in order to prevent illegal or unethical conduct occurring, or to address matters if they do occur. Any concerns or suspicions about breaches of policies within the business or supply chain are raised immediately in accordance with the company whistleblowing policy. The whistleblowing policy protects staff and encourages them to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

If a concern is raised, an initial assessment is conducted to determine the scope of investigation required. The company will keep the member of staff fully informed. Any investigation may result in recommendations for change to enable the company to minimise the risk of future wrongdoing.

No such reports have been filed since the system has been implemented.

Line managers must be notified immediately of any risk of conflict to SafeLane's codes of conduct and policies. The company will ensure anyone raising concerns under the scope of these policies can do so without fear of reprisal, safe in the knowledge that they will be taken seriously and that the matters will be investigated appropriately.

All staff and companies that SafeLane conducts business with undergo a compliance screening in accordance with SafeLane's ISO 9001:2015 certified Quality Management System (QMS). This screening assists in ensuring that all staff, and businesses associated, adhere to the high ethical standards set in company policies and that are expected in terms of the conduct of SafeLane personnel. A compliance screening is conducted prior to supplier selection and renewed on a weekly basis.

Any Human Rights breaches will result in the organisation taking disciplinary action against individuals, and/or the termination of its relationship with any organisation or supplier.



# 3 LABOUR

## ASSESSMENT, POLICY AND GOALS



Safelane Global Limited supports the UN Global Compact principles on labour standards, and adheres to local laws on labour rights. Safelane does not participate in any form of forced or bonded labour, complies with minimum wage standards, and supports the abolition of child labour.

It is committed to promoting equality and diversity in its own policies, practices and procedures, and in those areas in which it has influence. Safelane intends to treat everyone equally and with the same attention, courtesy and respect regardless of disability, gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religion or belief or sexual orientation.

**SAFELANE'S NON-DISCRIMINATORY EMPLOYMENT PRACTICES EMBRACE DIVERSITY AND INCLUSION.**

**THEY HAVE ENABLED THE COMPANY TO ACCESS SKILLED, PRODUCTIVE TALENT GLOBALLY AND DEVELOP AND ENHANCE THAT TALENT.**

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# IMPLEMENTATION

Employees are informed of the anti-discrimination policy and provided with equality and diversity training appropriate to their needs and responsibilities. All those who act on SafeLane's behalf are also informed of the anti-discrimination policy and are expected to pay due regard to it when conducting business on the company's behalf.

In all its dealings, including those with suppliers, contractors and recruitment agencies, SafeLane seeks to promote the principles of equality and diversity. The company makes every effort to reflect its commitment to equality and diversity in its marketing and communications activities. All SafeLane training programs in the UK and in the field are developed using gender-sensitive languages to ensure no offence or harm to any gender group.

All workers have a duty:

- To act in accordance with this policy
- To treat colleagues, visitors, customers and others with dignity at all times
- Not to discriminate against or harass another worker or person

## MEASUREMENT OF OUTCOMES

52% of personnel at SafeLane head office are female; all recruited on the basis of their skills, qualifications, talent and ambition. Women hold positions from board level to management and beyond - and are entirely unrestricted at SafeLane because of gender.

In the field, SafeLane actively pursues an equal opportunities recruitment policy, putting in place solutions to enable any potentially marginalised group better access to employment: e.g., flexible working hours to support primary child-carers.

As per new UN standards, all personnel deploying to projects are required to complete the four training modules Prevention of Sexual Exploitation and Abuse, Prevention of Sexual Harassment and Abuse of Authority, Ethics and Integrity and Gender Equality. Copies of certificates are held on personnel files. SafeLane field staff have a 100% pass rate.

SafeLane may be at risk of being held responsible for the acts of individual members of staff and will therefore not tolerate any discriminatory behaviour. It takes all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications. Employees have a duty to cooperate with the company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment. Employees are required to draw the attention of their line manager to suspected discriminatory acts or practices.

The company will ensure anyone raising concerns can do so through SafeLane's formal grievance procedures which ensures they are supported without fear of reprisal, that they will be taken seriously and that the matters will be investigated appropriately.

Any breaches may result in the organisation taking disciplinary action against individuals, and/or the termination of its relationship with any organisation or supplier

Any concerns or suspicions about breaches of labour policies and the Equal Opportunities and Diversity Policy within the business or supply chain must be raised immediately in accordance with the company whistleblowing policy.

In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. SafeLane will always take a strict approach to serious breaches of this policy.

No reports have been filed since the system has been implemented.



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# 4 ENVIRONMENT

## ASSESSMENT, POLICY AND GOALS



Safelane is committed to mitigating any possible negative environmental impact that may occur from operations. It has a 0% to landfill ambition globally.

Its environmental management follows the guidelines of ISO 14000 and IMAS 10.70 Safety and Occupational Health - Protection of the Environment and is reinforced by the corporate environmental policy. Field management practices also document Safelane policies on environmental issues such as camp hygiene and refuse disposal.

In its UK and German offices, 100% recycling is encouraged and enabled through the utilisation of recycling receptacles and active contracts with environmentally sustainable waste management companies. Everything from toner cartridges to confidential waste is recycled appropriately.

**SAFELANE ENCOURAGES STAFF TO UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY.**

**E.G. STAFF HAVE DONATED I.T. EQUIPMENT TO SCHOOLS IN AFRICA TO BRIDGE THE DIGITAL DIVIDE, EXTEND THE LIFE OF EQUIPMENT AND REDUCE WASTE AND CARBON FOOTPRINT.**

# IMPLEMENTATION

The management of health, safety, security and the environment (HSSE) at SafeLane is based on the following principles:

- setting objectives
- providing and documenting a system to realise the objectives
- assessing risk
- defining performance standards
- monitoring performance
- continuous improvement.

To fulfil its environmental policy, SafeLane implements the following actions:

- Ensures all employees and contractors are competent to do their tasks and provide training where appropriate
- Establishes and maintains 'best practices' and documented procedures to ensure that all activities that impact on the environment are managed in a pro-active and environmentally responsible manner
- Obtain the necessary licenses, permits and approvals from the appropriate government/regulatory bodies and ensure compliance
- Prepare and rehabilitate working sites in accordance with the relevant environmental regulations

SafeLane communicates client environmental policies/procedures to all contractors and site personnel and ensures compliance.

It implements management plans in order to minimise the impact of operations on native flora and fauna, to minimise disturbance to cultural/historically significant sites and minimise site environmental damage where evident by using appropriate risk assessment techniques to reduce environmental risk to ALARP (as low as reasonably practicable).

SafeLane also ensures emergency plans are in place to contain any accidental spillage or escape on-site.

It ensures regular reviews of the environmental systems are conducted to enable continuous improvement.

It reviews and revises this policy and objectives as necessary at regular intervals - and its offices and staff in the UK and Germany lead the way forward for the company as it strives to achieve its 0% to landfill policy globally.

# MEASUREMENT OF OUTCOMES

SafeLane Global maintains a system of records in order to demonstrate the extent of compliance with the HSSE Management System.

This is managed and maintained by its office and compliance managers.

Regular internal and annual external audits ensure consistency with SafeLane's environmental commitment.

Periodic review by senior management of all field practices is also undertaken, and if these result in recommendations for improvement, a follow up review is undertaken.

SafeLane recycles 100% of its office materials in the UK and Germany.





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# 5 ANTI CORRUPTION

## ASSESSMENT, POLICY AND GOALS



SafeLane's anti-corruption policy is designed to ensure business is conducted honestly and in compliance with the UK Bribery Act 2010.

No person to whom this policy applies shall use, allow, condone or tolerate corrupt practices or acts of bribery to obtain or retain business, to obtain a business advantage or for any purpose.

SafeLane Global attaches the utmost importance to this policy and applies a zero-tolerance approach to acts involving bribery or any other corrupt practices. This includes recognising reasonable steps required to ensure compliance by third party representatives (i.e. contractors, agents and partners).

### **SAFELANE'S WRITTEN ANTI-BRIBERY POLICY SERVES THREE DISTINCT PURPOSES:**

**1 PREVENT CORRUPTION BY HAVING ADEQUATE ANTI-BRIBERY PROCEDURES**

**2 MONITOR AND IDENTIFY CORRUPTION**

**3 RESPOND APPROPRIATELY IF CORRUPTION IS UNCOVERED**

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# IMPLEMENTATION

Employees are informed of the anti-bribery policy and provided with a copy during induction.

Additional information regarding common risks is available in the Office Staff Handbook and Field Contractor Guidelines. Where appropriate, training is provided.

Third-party representatives including field contractors, agents, partners and consultants are expected to comply with SafeLane's standards.

Prior to engaging a third party, company employees must:

1) Evaluate the background, experience, and reputation of the third party by obtaining references and conducting due diligence where appropriate

2) Take reasonable steps to appropriately monitor the transactions of third parties

3) Ensure the third party understands and acknowledges in writing their understanding and compliance with the company's anti-bribery policy.

Any breach of this policy is a disciplinary matter that is likely to result in summary dismissal.

# MEASUREMENT OF OUTCOMES

Each individual has a duty to help detect, prevent and report instances - not only of bribery, but also of any other suspicious activity or wrongdoing.

It is the responsibility of all company members, officers and employees to report violations or suspected violations of this policy.

The company is committed to ensuring that there is a safe, reliable, and confidential way of reporting any suspicious activity. Internal and external audits to ensure consistency with anti-corruption commitment, including periodic review by senior management are undertaken.

Furthermore, in each office there is a gratuity register which is peer and management reviewed.

No breach of policy has been documented since inception of these rules.





## 6 FUTURE INITIATIVES

SafeLane is an action-orientated organisation; its own sustainable development goals are aligned with those of the UNGC. Over the next 12 months, SafeLane will increase its already active focus on two specific areas: environment and labour - particularly environmental sustainability and capacity development.

### **ENVIRONMENT EXAMPLE:**

SafeLane has pioneered the utilisation of solar energy to power its camps in Yemen, reducing the use of diesel powered generators. This has significantly lowered the environmental impact of its presence in country.

The bespoke solution has been robustly tested and proven. It is SafeLane's intention to export the solution to its other international projects, beginning with those in support of the United Nations on the African continent.

### **LABOUR EXAMPLE:**

SafeLane understands from experience that promoting from within and developing existing talent boosts morale and helps with retention and maintaining productivity. It is critical for SafeLane office and field staff to know there is potential for growth.

Its current capacity development initiatives are closely focussed on two specialties, explosive ordnance disposal (EOD) and its explosive detection dog (EDD) teams.

EOD assistants are being trained and advancing to become operators, EDD personnel are receiving National Association of Security Dog Users (NASDU) accredited training, kennel hands are advancing to become handlers, handlers to trainers and trainers to instructors.

### **CONCLUSION**

By incorporating the Ten Principles of the UN Global Compact into its strategies, policies and procedures, and establishing a culture of integrity, SafeLane's ambition is to lead by example. It commits to enact the same exacting values and principles wherever it has a presence - from Afghanistan to Yemen, from the built environment to the marine environment. It remains fully committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of the company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.