



UN GLOBAL COMPACT COMMUNICATION ON PROGRESS (COP)

GLOBAL CONSOLIDATED CONTRACTORS
GCC



10 October 2019

UN Global Compact Communication on Progress (COP)

Statement to our stakeholders

Global Consolidated Contractors

GCC

We hereby express and confirm our continued support to the UN Global Compact and we renew our ongoing commitment to the initiative and its ten principles in the four issue areas – Human rights, labour, environment and anti-Corruption.

Going forward, we will continue to strengthen our commitment to the principles and before our next CoP, we aim to carry out a more structured impact assessment of the business activities in our company “GCC” and its subsidiaries.

GCC is proud to be a member of the UN Global Compact; GCC’s commitment extends beyond simply making our services and operations sustainable. By building broad objectives of sustainability into the way we do business, we seek to balance economic growth with social progress and environmental stewardship. This work resonates deeply with the sense of purpose that GCC employees share: our people and our services make the world a better place.

Yours sincerely,

Mostafa Alhassan

Chairman & CEO

A handwritten signature in black ink, appearing to read 'Mostafa Alhassan', is written over a horizontal line.

Introduction

We are a network of enterprises specialized in reconstruction programs to improve the standard of living in developing communities, with a specific focus on the Middle East and Africa. Our Group works closely alongside governments, defense investments, intergovernmental organizations, international consortiums and state-owned corporations to analyze, conceive and execute nationwide reconstruction and development initiatives.

We operate across the Oil and Gas, Defense and Security and Infrastructure and Building industries.

GCC “Global Consolidated Contractors”, GCC was established in 2006 to serve and focus on developing countries mainly the North African region. GCC is structured to serve the needs of government national development plans as well as military resources and infrastructure. We have invested in a strong technical team to offer diverse range of services, spanning master plans to infrastructure and contracting. GCC has headquartered in Egypt and expanded to Libya and South Sudan with management offices in USA and UK, GCC serves the construction industry, infrastructure, Oil & Gas and Defence & Security. GCC produced 4 main divisions; Engineering, Procurement, Contracting and Facility Management, and our market focus are Africa and the Middle East.

GCC is a registered United Nations (UN) Vendor #204605; we are used to work with many UN organizations in Egypt such as UNDP, UNOPS and UN WOMEN. Also GCC is a registered DoD “Department of Defense” contractor (SAM Registered DUNS#559448371) were we used to work with the US Army Corp of Engineers and also the American Embassy in Egypt in many ongoing projects as a main contractor.

GCC has developed strong network chain suppliers of manufactures, subcontractors, specialists as well as government and military representatives that allow GCC to utilize its maximum capabilities to serve projects for government infrastructure. The network development also gives GCC the credibility to become the preferred logistics partners for international contractors and developers. Using

our techniques and our lobbying division, we find competitive solutions for logistics and pricing methods. We consider ourselves a win-win contractor for our projects

GCC actively follows governmental policies in merging with international contracting firms and investors, acting as a key partner in the region. We currently focus on Egypt, Libya, Government of South Sudan, Sinai and Horn of Africa. We actively became the hub for the international contractor's project management supplier, consulting companies as their logistics partner in country.

Our teaming and infrastructure techniques management, specialists would allow us to blend quickly with our partners and provide excellent services for our projects.

We are always in developing process and we are updating our departments everyday to coop with the world technologies and enhance our services.

15 Years of Reconstructing Africa

Since our inception in 2006, we have undertaken over 180 major projects throughout East and Central Africa. Our philosophy has been to focus on education, healthcare, infrastructure and energy – the backbone areas of any successful society. Our group provides the holistic construction and construction management, procurement, project management, consulting and security.

The work we do is based on closely following global political and environmental trends to keep up with vital societal changes and meet the needs of future community. We select, build and develop our technical team, our management team, our workforce, and our partners across the local, regional and global scales based on one shared belief; our vision for a powerful Africa.

Our Vision for a Powerful Africa

We are creating futuristic African cities that are capable of becoming highly developed economies through fast industrialization and rapid growth.

We are assembling an Egyptian workforce capable of producing at double and triple the efficiency of others in the region, and exporting the workforce to undertake reconstruction projects throughout the entirety of Africa.

We are constructing a consortium of relentless partners, including the United Nations, the National Alliance Treaty Organization (NATO), the European Union, the United States Department of Defense, and the Egyptian Ministry of Defense, to work on realizing our collective vision of rehabilitating societies and reshaping conflict zones into technological and economical hubs

From the very beginning, the main motivation behind our work has been the need to consolidate the right resources to safely execute reconstruction projects in conflict zones - a feat that many development companies shy away from due to its complexity and uncertainty.

To realize this ambitious vision, we combined the advanced expertise of industry conglomerates in the United States and Europe with the quality, strength and efficiency of the Egyptian workforce.

Thus, we created the ideal formula for tackling high-risk, large-scale development projects across the region.

GCC LIBYA OPERATION HIGHLIGHTS:

Our teaming and infrastructure techniques management, specialists would allow us to blend quickly with our partners and provide excellent services for our projects.

GCC main experience was in Libya during 2006-2011 where we had worked with the higher level of the Libyan Government for the reconstruction and development program all over the country in many sectors such as Residential, Infrastructure, Education, Healthcare, Industrial and Recreational Facilities.

GCC role was very diversified from construction activities, subcontracting, procurement & procurement management, logistics management, inviting and merging with international contractors, as well as large project management and engineering companies like Hill international, IDOM, Aecom, Fluor, Bechtel, HWP and most of the well known design firms were part of our consortiums.

Through that experience GCC developed a very diversified wide scope of service, we were able to had 20,000 Egyptian labor under our management in Libya supporting the international contractors including camps and their facility management as well as subcontracting business, such as procurement of construction materials and specific equipment since we represent a number of international agencies.

In addition, GCC is working with many UN missions to Africa and now we are expanding to the EAC "East African Communities" such as South Sudan, Kenya, Tanzania and Somalia, forming as well international consortiums and supplying/supporting the UN missions in this region, same operations has been carried out for the US Corp. of engineers through a number of supplies which carried out to their base in Djibouti "Camp Lemonnier - a United States Naval Expeditionary Base".

GCC SERVICES HIGHLIGHTS

GCC offers a full facilities management service, camp design, procurement and installation, security & safety services, procurement services, fire prevention, land survey and marine survey, steel structures, mechanical & electrical maintenance activities as well as welding & advanced NDT.

GCC offers a complete and high quality range of integrated land survey, marine survey, Oceanic & Coastal Engineering Services, Mapping & GIS applications, archeological registration and restoration, geometrical design of roads, railway and tunnels and Environmental studies in Support of Civil engineering projects, Oil & Gas Sector, remote sensing and satellite image.

GCC established a sister company “GSL” for the defence & security industry, Global Security Logistics Co. (GSL) is a company established for providing Security and Guarding services. One of Egypt’s pioneering companies in security and protection, GSL is licensed by the Ministry of Interior to operate under their law of guarding and security companies inside and outside the Arab Republic of Egypt, as per the instruction of the General Security Authority. GSL provides services in these specific fields to the highest level of professionalism with the use of the latest technology and advanced training methods.



VISION

To be the most sought-after contractor for difficult projects in which meeting the challenges of execution and safety. We are a dedicated team striving to bring growth to our community; helping to maintain existing companies and assist our clients in making their dreams come to reality.



MISSION



Our mission is to provide expertly conceived and professionally executed services to meet the complex demands of today's world. Inspired by the newest technological possibilities and Market requirements, facilitates and accelerates the transfer of innovative technology to clients by affiliating and working closely with cutting edge technology providers.

ISO CERTIFICATES



UNITED NATIONS REGISTRATION

UNGM Vendors Registration # 204605

|  Your UNGM number is 204605 | |
|---|--------------------------------|
| Company registration status | |
|  The statuses of your company's registration submissions are shown below. For an explanation of what each status means, please | |
| UN organizations | Basic registration |
| ADB | Registered (15-May-2014 15:41) |
| AFDB | Registered (10-Sep-2013 18:12) |
| CTBTO | Registered (15-May-2014 15:41) |
| FAO | Registered (13-May-2013 17:49) |
| IAEA | Registered (15-May-2014 15:41) |
| IFAD | Registered (29-Jan-2013 16:26) |
| ILO | Registered (08-Jan-2013 15:06) |
| ITC | Registered (02-Jan-2013 11:01) |
| ITU | Registered (15-May-2014 15:41) |
| OPCW | Registered (15-May-2014 15:41) |
| PAHO | Registered (02-Apr-2015 15:19) |
| UN Secretariat | Registered (19-Aug-2013 20:41) |
| UNAIDS | Registered (15-May-2014 15:41) |
| UNDP | Registered (21-Aug-2013 09:19) |
| UNESCO | Registered (24-Dec-2012 11:36) |
| UNFPA | Registered (15-May-2014 15:41) |
| UNHCR | Registered (16-May-2013 17:53) |
| UNICEF | Declined (24-May-2013 14:21) |
| UNIDO | Registered (08-May-2013 15:55) |
| UNOPS | Registered (08-Jan-2013 12:56) |
| UNRWA | Declined (27-Dec-2012 13:14) |
| UN-Women | Registered (22-Oct-2014 17:50) |
| WFP | Registered (24-Dec-2012 11:37) |
| WHO | Registered (15-May-2014 15:41) |
| WIPO | Registered (11-Jan-2013 15:47) |
| WMO | Registered (15-May-2014 15:41) |

TRACE CERTIFICATE



The internationally recognized organization
working with companies to raise anti-bribery
compliance standards worldwide.

www.TRACEinternational.org

This certifies that
Global Consolidated Contractors S.A.E.
has completed a comprehensive background review and
is TRACE Certified.

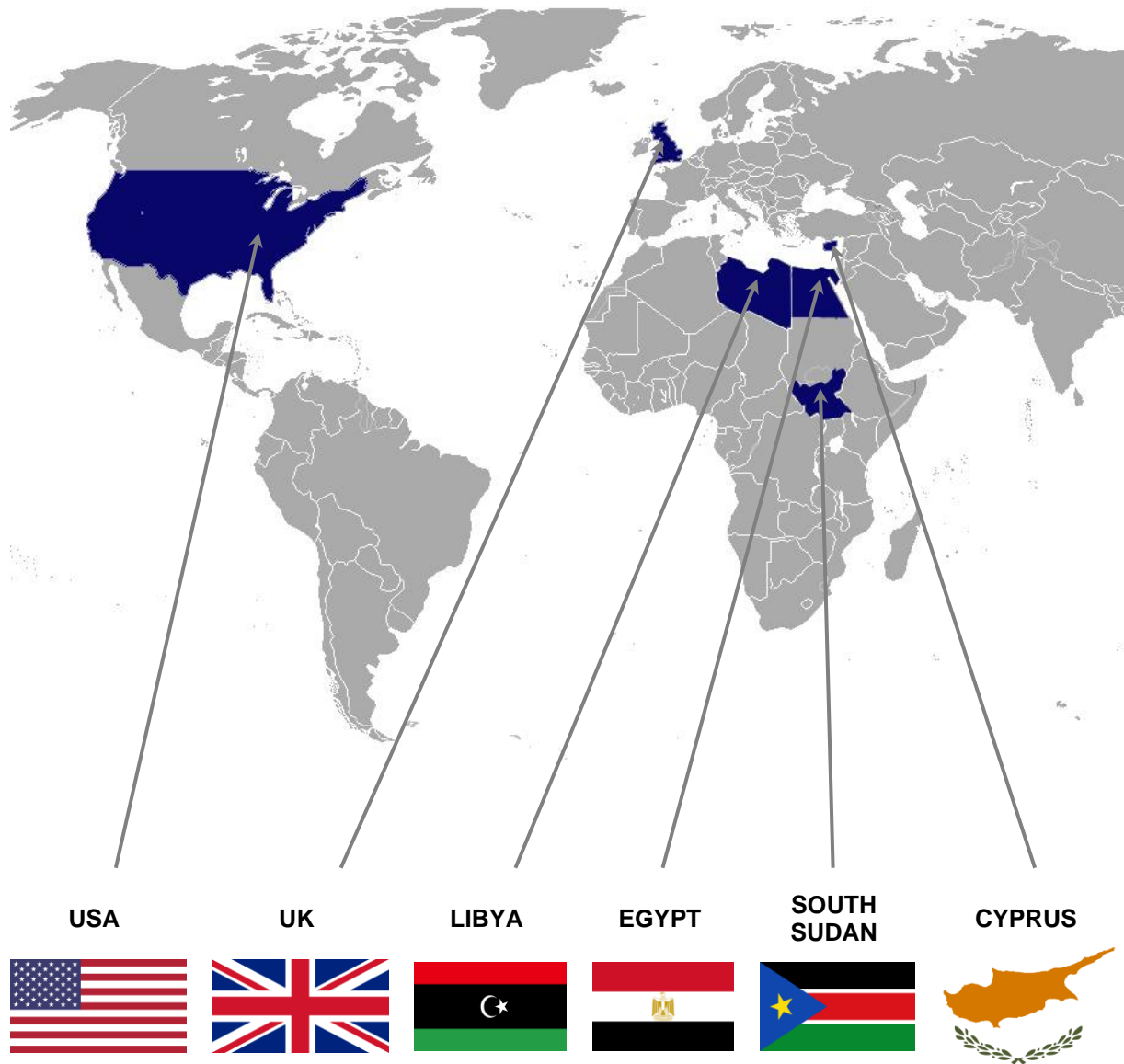
October 15, 2015 - October 14, 2016

TRACEcertification ID: TC4133-2384

Alexandra Wrage, TRACE President

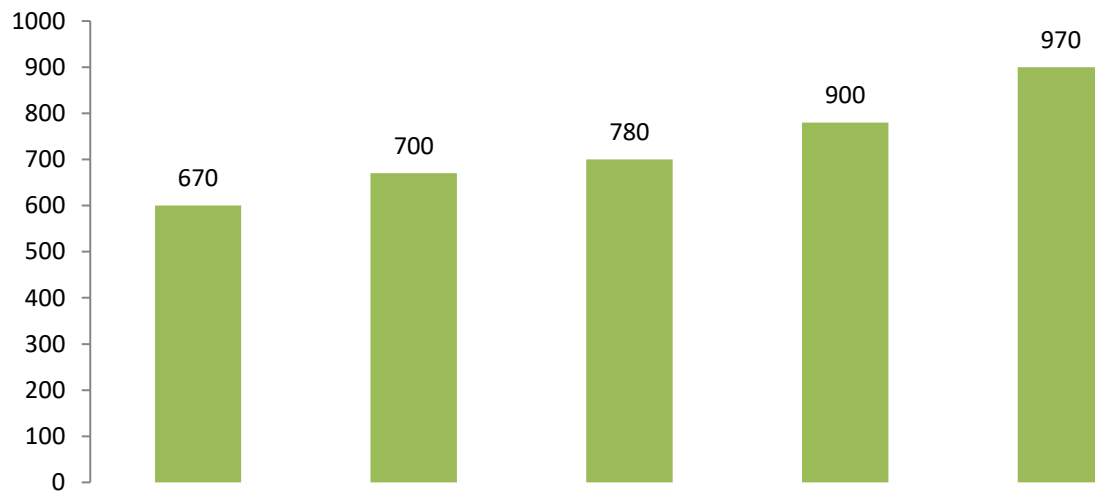


TRACEcertification is not a guarantee against past or potential wrongdoing by the certified entity or a guarantee against potential liability. A summary of any red flags identified during the TRACEcertification review is included in the report, but not all red flags preclude TRACEcertification. Companies doing business with this TRACE Certified entity should always request a full copy of the underlying report. To view a complete list of TRACE Certified entities, please visit the TRACE Intermediary Directory at <https://tpms.TRACEinternational.org/IntermediaryDirectory>.

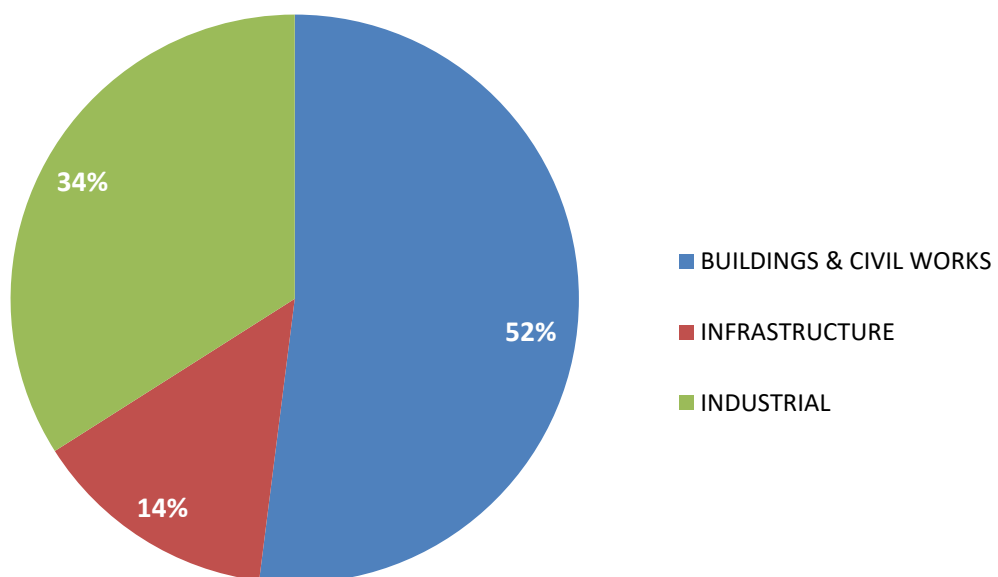


FINANCIAL CAPACITY

2015-2019 TURNOVER IN EGP MILLION



TURNOVER PERCENTAGE BY SECTOR



Effective stakeholder Engagement

We continue to engage closely with key stakeholder groups across all functions at different levels depending on the nature of the relationship and transactions.

Communication is an important aspect of engagement using direct and indirect means, such as frequent meetings, one-on-one interactions, email messages, and events, which are two-way channels that provide feedback and suggestions to help make continuous improvements in the quality of our services.

The aim is to build a strong chain of accountability within the organization towards meeting stakeholders' needs and concerns, and the quality of our services.

Future outlook

We are on the cusp of a new era for our region, ripe with investment opportunities in reconstruction of conflict zones and disaster-affected areas. The public and private sectors are creating joint ventures to rebuild after adversity and develop

communities capable of rising to and exceeding the global standards of technologically and economically advanced cities.

Over the next period, we are focusing our efforts into expanding throughout East and Central Africa.

We are optimizing our supply chain to facilitate trade and investment across our countries of operation, and bridging more gaps between the West and East.

Memberships

| Organization | Issues of Interest and benefits |
|--|--|
| American Chamber of Commerce AmCham | <ul style="list-style-type: none"> • Workshops • Business Matchmaking (BMM) • professional education and training especially safety best practices • the latest in E-Learning courses through its Online Training Service (OTS) • Recruitment Center • International certification • Executive Programs • Reports, publications & resources. |
| British Egyptian Businessmen Association (BEBA) | <ul style="list-style-type: none"> • Workshops & Seminars • Networking • Trade Forums • Events • Business Missions • Business Conferences |
| Egyptian Businessmen Association (EBA) | <ul style="list-style-type: none"> • Best practices complying with the governmental lays • Import & Export publications & training sessions • Safety awareness • Labor right laws implementation • Business Missions • Business Conferences |

GLOBAL CONSOLIDATED CONTRACTORS – GCC

THE TEN PRINCIPLES

In this section, we report our progress on implementing the Global Compact principles in each of the four issue areas – Human Rights, Labour, Environment, and Anti-Corruption.

GCC fully commit to the ten Principles of the UN Global Compact

HUMAN RIGHTS

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

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.

ENVIRONMENT

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

ANTI-CORRUPTION

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

TARGETS AND ACHIEVEMENTS

We have implemented initiatives to strengthen our commitment to the Ten Principles, and thus the targets we set to reach before the publication of this COP have been achieved:

- Implementation of Data Collection and analysis system, addressing problems and solution finding in collaboration with our all departments.
- Implementation of GCC reporting & communication system for the reporting of infringement on the principles in the four issue areas.
- Training plans for employee by participation on online training programs.
- Implementation of GCC CSR Policy that also addresses the Ten Principles directly. The policy was adopted on the board meeting of GCC on 25 March 2018. The full policy can be found in Appendix 1

The business areas and an external human rights expert were involved in the process of formulating our GCC CSR Policy to ensure that all relevant issues were included in the policy. The policy was approved by the board of directors of GCC and subsequently by the boards of directors of each of the business areas.

The responsibility of complying to GCC CSR Policy, thereby ensuring respect and support of the Ten Principles, is allocated to the management of each business area in GCC. Three employees were appointed to assist the responsible managers in complying with the GCC CSR Policy.

Employee involvement in activities related to the implementation of the policy, and stakeholder involvement in general, is appreciated and we expect them to inform managers in case of infringement. Infringements can also be reported through the communication & reporting system. All material input from the system will be presented to the Audit Committee of GCC.

LABOUR

CSR owner intentions

GCC and the board have set out the following expectations to the companies in relation to labour and the Group's employees:

- Development plans & procedure
- HSE improvements
- Provide conditions and opportunities for the employees' personal and professional
- No tolerance of child labour
- Support employees and relatives of employees facing unexpected unfortunate situations

Risk assessment

The risk of GCC infringing the principles on labour is assessed to be low, primarily since the company HR Department follows the Egyptian Labour Law where labour rights are highly protected. To minimise the risk of infringement, we have implemented policies, procedures and formulated a handbook for employees in GCC.

Policies

Our CSR Policy also addresses the labour principles directly. The policy imposes GCC and the business areas to regularly identify, prevent or mitigate, and to provide remedial processes to potential adverse impacts. According to the policy GCC, the business areas and all business connections are required to implement the principles, to comply with the Declaration on the Fundamental Principles of Rights at Work and the legislation in relation to Modern Slavery.

Our Risk Management Policy and Legal Policy also address the principles of labour indirectly. These policies require GCC and the business areas of the Group to take a qualified position on risks and to comply with all relevant legislation – also in relation to labour. GCC has published a handbook for the employees. The handbook

explicitly addresses the employees' responsibilities, rights, compensation, vacation, etc., and the company's policies. Every employee holds an annual review with their manager where expectations, results, concerns, compensation, individual targets, etc. are discussed.

Outcomes

The target for gender diversity on the board of directors in GCC was met in 2018. The target is to have at least one female board member at any time and by the end of the year, there was one female board member. This corresponds to 15% of the board members.

In 2018, an employee satisfaction survey was completed. The results were very satisfactory and on level with comparable top-performers. Despite this, the survey indicated room for improvement and based on input from the employees, a number of initiatives will be implemented in 2019. We aim to survey employee satisfaction every second year.

Target

For the issue area of labour, our target is to carry out a structured impact assessment of the activities in GCC.

HUMAN RIGHTS

This is an area which has become increasingly important to businesses in every sector, not least our own industry. We cannot ignore that there are issues to be faced, addressed and solved to the best of our abilities. Following UN policies and multi-stakeholder consultation, we have published our own guidelines to reflect what's happening today and how we can all work to tackle and eradicate abuses.

CSR owner intentions

GCC and its board of directors have defined a number of CSR intentions that all affiliated companies in GCC are expected to follow, and GCC is responsible for ensuring compliance.

Regarding human rights specifically, the companies in GCC must do the following:

- not to tolerate any violation of universal rights; and
- when relevant, operate in accordance with a code of conduct

Risk assessment

The risk of GCC infringing the principles on human rights is assessed to be a little bit low, mainly because we indirectly address human rights in our Risk Management, Legal matters, and Crisis Management, where human rights are highly protected. Even though this is the case, we have policies in place to ensure that we respect and support human rights, because we acknowledge that our business areas are at greater risk of infringing the principles.

Policies

Our CSR Policy directly addresses human rights and commits GCC and the business areas to regularly identify, prevent or mitigate, and to provide remedial processes to potential adverse impacts. The minimum requirement is compliance with the International Bill of Human Rights and the UN Guiding Principles for

Business and Human Rights. Furthermore, the policy stipulates that the same is expected of all business connections of GCC.

Target

Our target for our next COP in relation to human rights is to carry out a solid structured impact assessment of the activities in GCC. We do not expect to identify significant adverse impacts.

ENVIRONMENTAL RESPONSIBILITY

GCC owner intentions

GCC and its board have similarly defined expectations for the companies' environmental impact:

- Evaluate and if possible minimise the environmental impact from the beginning to the end of a project lifecycle
- Improve water and energy efficiency and minimise waste of raw materials to reduce adverse environmental impacts
- Grow the proportion of renewable natural resources used in new projects.

Our ambitions go further than the Companies internal activities and the companies are also expected to:

- Endorse relevant certification systems and standards regarding environment
- Work systematically on environmental issues in the construction sector, especially by committing to improving the energy performance of buildings
- Develop new standards in eco-friendly construction and influence the agenda on environment by forming strategic partnerships

GCC Environmental Management System Statement

GCC achieved ISO 14001:2004 certification in October 2015. The following GCC documents are held in support of this:

- Environmental Policy Statement - this includes maintaining an Environmental Management System that conforms to ISO 14001
- Environmental Management System model
- Environmental Management System Manual contents
- Management Review Procedure
- Documents register showing relationship between ISO9001 and 15014001 documentation
- Environment aspect chart
- Environment aspect register

- Legal Register
- Waste monitoring
- Environmental Emergency Response and Pollution Prevention
- Waste management procedures

Risk assessment

The risk of GCC infringing the principles of environment is assessed to be low, mainly due to the nature of our business activities and their relatively low impact on the environment. The business areas are at a greater risk of infringing the principles but they also contribute positively in different ways.

The construction business areas offer energy-efficient solutions that reduce the energy consumption of buildings and infrastructure. The solar thermal energy business area constructs clean and affordable energy solutions which reduce the emission of CO₂. However, our business areas being construction and services companies, we acknowledge the risk of infringing the principles which we seek to minimise by way of our policies.

Policies

Our CSR Policy imposes GCC and the business areas to regularly identify and prevent or mitigate potential adverse environmental impacts and to inform the authorities in case of an incident – all in alignment with the OE CD Guidelines for Multinational Enterprises. Business connections are expected to do the same.

The environment principles are indirectly addressed in our Risk Management Policy and Legal Policy. According to these policies, GCC and the business areas are to take a qualified position on risks and to comply with all relevant legislation, also in relation to environmental issues.

Target

The completion of a structured impact assessment is also a target for the issue area of environment for our next COP.

ANTI-CORRUPTION

CSR owner intentions

GCC had completed a comprehensive due diligence process administered by TRACE “the world’s leading anti-bribery standard setting organization”. Thereby a Certification provided by TRACE that GCC has completed internationally accepted due diligence procedures and has been forthcoming and cooperative during the review process. The successful completion of TRACE certification demonstrates a commitment to commercial transparency, allowing us to serve as a valued business partner to multinational companies.

Our employee got training sessions within Trace Platform in Anti-Bribery Compliance, Avoiding Trafficked Labor, and Conflicts of Interest; meanwhile we ensure proper policies and procedures of anti-corruption within our organization. We are doing our best towards our employees to be familiar with the law, do not participate in Bribery, and understand the impact of a bribery incident to the organization.

Regarding anti-corruption, GCC and the board expect the companies:

- To comply with the GCC Anti-Corruption Policy
- The hospitality register is regularly updated, and is reviewed quarterly by our Audit Committee.

Risk assessment

The risk of GCC infringing the principle on anti-corruption is assessed to be low as during the year no disciplinary action was required regarding corruption, this is because our departmental teams monitor business interactions to ensure that ethical business practices are maintained.

For the business areas, the risk of infringing the principle is slightly higher due to the regional presence and operations in countries, where corruption and fraud are more prevalent.

Policies

As an ethical business GCC ensures that our business interactions do not infer any type of corruption. The organisation regularly bids for work through transparent tender processes and framework agreements. As part of our quality management system all new suppliers and contractors are thoroughly assessed before work is undertaken and a PO is agreed.

GCC operates a clear delegated authority system that ensures checks and balances over the procurement and sales processes.

GCC disciplinary procedure clearly states that the acceptance of bribes or incentives of any sort is misconduct and appropriate action will be taken.

The senior management team and directors have had a briefing on the bribery act and are regularly reminded to maintain the register of hospitality given or received.

According to our Group CSR Policy and in alignment with the OE CD Guidelines GCC and the business areas are required to regularly identify and prevent or mitigate potential adverse impact related to corruption, money laundering and anti-trust. The appropriate authorities should be informed in case of an incident. All business relations are expected to follow the same procedures.

In addition to our CSR Policy, our Anti-Corruption Policy and Competition Law Compliance Policy address the principle on anti-corruption. In short, these policies impose Group companies to comply with all relevant international and/or national anti-trust law and competition law and contain guidelines for appropriate behaviour in different situations.

Our Legal Policy stipulates that Group companies are to comply with all relevant legislation which also includes regulation on anti-corruption.

Target

Our target for our next COP in relation to anticorruption is to carry out a structured impact assessment.

Appendices

Appendix 1: GCC CSR Policy

This policy describes the approach to be taken in relation to the corporate social responsibility (CSR) of GCC based on the UN Global Compact, which we have signed, and the internationally agreed minimum standards for responsible business conduct – the UN Guiding Principles for Business and Human Rights (UNG P).

The policy applies to GCC and affiliated companies in which GCC owns or controls, directly or indirectly, more than 50% of the votes or value of outstanding shares.

It is the purpose of GCC to establish a number of model companies, which cooperate in an exemplary manner. A “model company” is a company working with services and products useful to society, which treats its customers, suppliers, employees of all categories and shareholders better than most other companies.

It is the overall CSR policy of GCC and affiliated companies, with the UN Global Compact principles as framework, live up to this CSR commitment, that all GCC companies, employees, and business relationships, at all times, comply with the UN Guiding Principles for Business and Human Rights in relation to the subject matters covered by UN Global Compact’s Ten Principles – and that they contribute to sustainable development in line with their corporate strategy.

At all times, GCC will comply with existing laws and regulations for the jurisdictions in which we operate, and we expect all our business connections to do the same. Specifically, each Business Area in GCC and any business connection of GCC shall:

1. Respect human rights

i.e. adopt a policy commitment to establish and maintain human rights due diligence, where the companies regularly identify, prevent or mitigate their potential adverse impacts, and provide for access to remedy for actual adverse impacts; at a minimum in relation to the human rights contained in the International Bill of Human Rights, that also contains the rights referenced in the International Labour Organization as reflected in the Declaration on the Fundamental Principles of Rights at Work.

It shall be noted that impacts in relation to Modern Slavery and the right to safe and healthy working conditions are included in such due diligence.

2. Systematically manage significant adverse environmental impacts

i.e. adopt a policy commitment to establish and maintain environmental due diligence, where the companies regularly identify, prevent or mitigate their potential adverse impacts, and inform the appropriate authorities of such significant impacts should they occur according to the OECD, and

3. Systematically manage risks for corruption, money laundering and anti-trust practices

i.e. adopt a policy commitment to establish and maintain economic due diligence, where the companies regularly identify, prevent or mitigate their potential adverse impacts in relation to corruption, money laundering and anti-trust, and inform the appropriate authorities of such impacts should they occur according to the OECD.

The Group CSR Policy and its relation to other policies

This policy shall be embedded in all other policies (including Group policies) and procedures where relevant, and reference is made to these.

Our expectations to our employees:

We expect all our employees to assist us in meeting our core responsibilities and appreciate involvement in activities related to implementation of this policy.

Furthermore, we expect our employees to react or inform their managers, or any other appropriate functions, if they identify any potential adverse impacts in relation to the principles included in the UN Global Compact framework.

Who is responsible? The Role of the Management of GCC

Compliance in relation to this policy is the responsibility of the management of each company of GCC. Within the overall framework, each business area is responsible for identifying its own specific CSR strategic objectives according to which the individual company shall contribute to sustainable development, adapted to the company's organization, geographical presence and market position.

In GCC and in each Business Area, one or more officers are responsible for implementation and for monitoring the compliance in relation to this policy. The officers shall implement due diligence processes in relation to compliance with this policy, cf. 1-3 above.

These elements are part of a continual, ongoing process. The result of the due diligence process can be used to guide GCC's strategy and execution efforts with continuous improvement of our general CSR activities within the framework of the UN Global Compact's Ten Principles.

Other UN goals within this framework, e.g. the Sustainable Development Goals (2015-2030) and the Blueprint for Corporate Sustainability Leadership can inspire concrete strategic objectives and actions.

Involvement of GCC

GCC appoints an employee to be contacted by the above officers and the management of the individual GCC companies for advice in relation to the requirements of this policy. Whenever necessary, GCC may issue guidelines and instructions to support the implementation of this policy and to ensure that the minimum standard for responsible business conduct is met.

Renewal and Communication of the Group CSR Policy

This policy shall be reviewed whenever relevant, and at least every three (3) years. It shall be made public and communicated to employees, business connections, and other relevant stakeholders of GCC.