

# UN GLOBAL COMPACT COMMUNICATION ON PROGRESS

NOVEMBER 2019



# TABLE OF CONTENTS

Table of contents.....	1
Statement of continued support from the CEO.....	2
Introduction.....	3
<b>UNGC Principle: Human rights</b> .....	4
Assessment, policy and goals.....	4
Adara Implementation.....	5
Measurement of outcomes.....	6
<b>UNGC Principle: Labour</b> .....	7
Assessment, policy and goals.....	7
Adara Implementation.....	7
Measurement of outcomes.....	8
<b>UNGC Principle: Environment</b> .....	8
Assessment, policy and goals.....	8
Adara Implementation.....	9
Measurement of outcomes.....	10
<b>UNGC Principle: Anti-Corruption</b> .....	10
Assessment, policy and goals.....	10
Adara Implementation.....	11
Measurement of outcomes.....	11

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## A STATEMENT FROM OUR CHAIR AND CEO

At the heart of Adara is a commitment to people living in poverty and a determination to use the power of business to make our world a better place. It is for this reason that we are strong supporters of the United Nations Global Compact (UNGC). We believe it recognises that business has a significant role to play in creating an inclusive and sustainable world.



At Adara we believe that each and every person should have access to quality health, education and other essential services, no matter where they live. The first part of the Adara Group is an international development organisation called Adara Development that has expertise in maternal, newborn and child health, and remote community development. The second part of the Adara Group consists of two financial services businesses, Adara Partners and Adara Advisors, which are 'for purpose' rather than for profit. Together, these entities make up the Adara Group. The sole objective of Adara's businesses is to fund Adara Development's administration, infrastructure and emergency project costs. This allows 100% of donations received by Adara Development to go directly to project-related costs.

Our work aligns closely with the UN Sustainable Development Goals (SDGs) which provide a shared blueprint for the future of our planet. We recognise that the SDGs can only be achieved in partnership and that all sectors have a role to play. Our commitment to partnership across divides is embodied in our tagline: "Bridging Worlds."

The Adara Group has been a member of the UNGC for 12 months, and we actively support and promote this important initiative.

I am pleased to confirm that the Adara Group reaffirms its support of the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this first Communication of Progress, and through our [2018 Operations Report](#), we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations.

Yours sincerely

A handwritten signature in black ink, appearing to read "Audette Exel".

Audette Exel  
Chair, CEO and Founder

## INTRODUCTION

The Adara Group is a partnership between an international development organisation called Adara Development and two corporate advisory businesses, Adara Advisors and Adara Partners. The Adara businesses exist for the sole purpose of generating profits to directly benefit people living in extreme poverty. Profits made by Adara Partners and Adara Advisors are donated to Adara Development, covering their core support, administration and emergency project costs. The Adara Group is credited with being one of the earliest examples of a "Business for Purpose."

We have put more than AUD \$45 million to work for people living in poverty. Our work touches the lives of more than 50,000 people living in poverty every year, as well as countless others through knowledge sharing.

## REMOTE COMMUNITY DEVELOPMENT

Adara Development's remote community development work supports people living in isolated communities and encompasses service delivery across health, education and child protection. Our work reaches three key areas of Nepal: the district of Humla in the Himalayas, the region of Ghyangfedi and the capital, Kathmandu.

Our education work centres on maintaining and developing model schools by partnering with local organisations, schools and communities in Humla and Ghyangfedi. These education initiatives focus on school improvement including teacher employment and training, school infrastructure and materials, after-school activities and vocational scholarships.

Adara also implements significant health projects. We work to improve access to local health services, working with existing services that often severely lack facilities, personnel and medicines. We also work to improve nutrition, hygiene and health awareness.

## MATERNAL, NEWBORN AND CHILD HEALTH

Over the past two decades, Adara Development has gained deep experience and knowledge in maternal, newborn and child health. During this time, our work has primarily focused on strengthening services by supporting health programmes that ensure women and children – particularly low-birthweight and premature infants – have access to critical services.

With our partner, Kiwoko Hospital in Central Uganda, we have implemented a model of care that encompasses training and ensures the hospital is equipped with adequate facilities, staffing, equipment and supplies. Our projects also include newborn follow-up and early intervention for at-risk infants, and a Safe Bubble continuous positive airway pressure kit which blends air and oxygen without electricity for premature babies in respiratory distress. This device could save tens of thousands of lives every year.

We are now working with the Ministry of Health to share our knowledge. We are working with nearby Nakaseke Hospital – a government facility which serves an area of 1.7 million people. Based on learnings from this work, we plan to build our work with other newborn health partners, including the Ministry of Health.



# 1. HUMAN RIGHTS PRINCIPLES

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

## 1.1 ASSESSMENT, POLICY AND GOALS

Adara's vision is that each and every person has access to quality health, education and other essential services, no matter where they live. Our mission is to bridge the world of business and the world of people in extreme poverty, and to support vulnerable communities with health, education and other essential services. Wherever we operate, we respect and support human rights, articulated in the Universal Declaration of Human Rights (1948).

Adara's Development Philosophy is the cornerstone of Adara's commitment to upholding human rights. It is available on Adara's website and all staff, volunteers and development partners are trained in our philosophy. The Development Philosophy reinforces Adara's deep and connected relationships with the communities in which we work with, our local NGO partners and our donors. It also

- informs all Adara's programming, processes and evaluation;
- underpins how we monitor and manage day to day impacts and concerns;
- identifies and manages social risks, to allow us to form long-term community partnerships.

Adara's development approach involves a long-term commitment to our projects. Given the potential adverse human rights impact of ending a project prematurely, Adara will only cease funding a project or community when we have seen our projects have achieved behavioural change, capacity is built and there are sufficient additional resources to support the continuation of service delivery.

Through Adara's development projects we work with many vulnerable children and communities. Adara endorses the principles of the UN Convention on the Rights of the Child (1989), specifically Article 19. Adara promotes child protection with its stakeholders at all levels, through its Child Protection Policy and Child Safeguarding Toolkit (which supports the implementation of the Child Protection Policy). This Toolkit includes minimum standards across:

- HR and training processes;
- travel to project sites;
- creating child-safe environments;
- child safeguarding reporting;
- risk management;
- safe use of children's photos, videos and stories;
- working with our local partners to implement child safeguarding policies.

All personnel engaged by Adara must sign the Child Protection Code of Conduct and are trained in safeguarding. Positions which involve contact with children or working with children (even remotely) must undergo, where practicable, a police check, and where relevant, a working with children check. This includes all visitors to project sites, who are also inducted in safeguarding before visits.

Across both our business and development arms, Adara requires business partners and suppliers to uphold and support human rights. Adara's Partnership Guidelines set out selection criteria and due diligence requirements to thoroughly evaluate the fit between Adara's values and a potential partner. We seek to ensure that all partners share our values and meet key governance and compliance requirements, particularly in relation to implementing key safeguarding policies, protecting children and preventing any form of child abuse or exploitation.

The Adara businesses are Certified B Corporations, meaning they have met verified high standards in relation to social and environmental performance, public transparency and legal accountability in their operations.

<b>1.2 HUMAN RIGHTS PRINCIPLES IMPLEMENTATION</b>	
<b>POLICIES OR PROCESSES</b>	<b>IMPLEMENTATION</b>
Processes to ensure that internationally recognised human rights are respected	<p>Adara has thorough recruitment processes for staff and volunteers, and onboarding processes for partners to ensure that we employ and engage personnel who are aligned with our respect of human rights.</p> <p>Adara integrates a rights-based approach into the development of its programmes, which is written into our overarching Maternal, Newborn and Child Health (MNCH) and Remote Community Development Plans. On all projects and strategies, Adara’s approach is to engage vulnerable people, including women, children, people with disabilities and other marginalised groups.</p>
On-going due diligence that includes an assessment of actual and potential human rights impact in key programme activities	<p>Adara’s rights-based approach, which is aligned with the UN Sustainable Development Goals (SDGs) ensures that human rights considerations are assessed at every stage of the development of its programmes, from design to evaluation.</p> <p>For example, Adara’s MNCH Plan is aligned with SDG 3 (good health and wellbeing) and works towards our strategic goal of reducing preventable maternal, newborn and child deaths and improving the health and well-being of communities in low-resource settings.</p> <p>Through all phases of programme development Adara actively collaborates with local communities to ensure accurate assessment of any potential human rights impacts. We consistently monitor the progress of our projects to ensure they all have the desired outcome and to implement mitigation strategies as issues arise.</p>
Awareness raising and training on human rights for employees	<p>Adara’s induction programme, Adara University, based on the principles of our Development Philosophy, trains all new staff on the protection and promotion of human rights, including anti-discrimination and child protection.</p> <p>Adara staff working on project sites have regular training on child protection and safeguarding. In 2019, all Adara offices, including several partners, received child protection training.</p> <p>Adara also implemented a complaints box at Yalbang School in Humla, Nepal who Adara has partnered with since 1998. This provides students with a confidential grievance mechanism if they feel their safety is threatened or rights are being abused.</p>
Allocation of responsibilities for the respect and support of human rights	<p>Adara promotes accountability and transparency to ensure responsibility for the respect and support of human rights is assumed by all relevant stakeholders, at all levels.</p> <p>For example, Adara’s Partnership Agreements include an obligation on the partner to comply with Adara’s child protection policy, including following processes such as undertaking child safe recruitment. In addition, the Partnership Agreements require all partners to agree in</p>

	<p>an ethical manner which respects the cultural practices, sensitivities and dignity of beneficiaries, in particular women and children.</p> <p>Adara also provides training assistance and shares knowledge with its in country programme partners regarding child protection and safeguarding.</p>
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### 1.3 ACHIEVEMENTS

Adara’s model of business has a direct impact on remote communities, including protection and promotion of human rights.

Adara has worked with our partner Kiwoko Hospital (Kiwoko) in Nakaseke, Uganda for over 20 years, and with women, children and families in surrounding villages to improve and deliver health services. In particular, Adara works side by side with Kiwoko assisting at-risk babies, designing and delivering nurse and midwife training, and equipping and resourcing Kiwoko Hospital’s neonatal intensive care unit (NICU).

The partnership reached a milestone in 2018 when the Ugandan Ministry of Health recognised the Kiwoko NICU as a centre of excellence for the entire country. Together, Adara and Kiwoko provide care to more than 1,200 small and sick newborns in the NICU, as well as more than 3,500 women in the Kiwoko maternity ward every year. Nearly one million people live in the Kiwoko Hospital catchment area and Adara’s work ensures these people have access to quality health services.

As part of our commitment to knowledge sharing, we have launched a newborn pilot project with Nakaseke Hospital – a government hospital a half hours’ drive from Kiwoko. Adara is assisting Nakaseke to develop a small special care baby unit (SCBU) designed for babies who are not critically ill but need more care than healthy newborns. Between April 2018 – June 2019, the SCBU has cared for 602 babies with a 99% survival rate.

In Nepal, we have been working with communities in Humla for over 20 years. Our earliest project, Yalbang School was named in 2017 as the best school in remote districts of Nepal and the fifth best school in Nepal by the Ministry of Education among 30,000 government and 7,000 private schools. There has been a 600% increase in students enrolled in Adara’s partner schools in Humla since 2011. This underscores Adara’s commitment to Article 26 of the UN Declaration of Human Rights. We continue to share our knowledge about remote education with other NGOs and local governments, with the goal of providing more children with access to education.

We have also strengthened the capacity of our child clubs in our partner schools in Humla and the Shree Ghyangfedi School. Child clubs are a powerful way to empower students to take responsibility and leadership within their community. In 2019, Adara ran training sessions for 163 students from seven child clubs in our target villages. The aim of the training is to increase students’ awareness about child protection and child rights issues, to include them in the decision making for their schools, and to increase students’ wellbeing and overall involvement. Members of the child clubs are now engaging in rural municipality meetings.

Since 2006, Adara has worked with a group of 136 children in Nepal who were trafficked from their homes to Kathmandu and were found in deplorable conditions. We have worked with these children to rehabilitate and reintegrate them with their families and assisted them with mentoring, education and employment. Through our work with these children, we have developed deep expertise in supporting the education and well-being of at-risk and disadvantaged youth. In 2018 we supported 37 young people pursuing degrees in health, nursing, science, teaching, engineering and agriculture.

## 2. LABOUR PRINCIPLES

- **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

### 2.1 ASSESSMENT, POLICY AND GOALS

Adara believes in the importance of a safe and healthy work environment which encourages diversity and equal opportunities for all its employees and contractors. We value the strength that a diverse workforce and an inclusive culture brings to our organisation. Because we prefer to employ local candidates in our programme locations, our local workforces, including our leaders, are representative of the communities in which we operate.

Our control framework of relevant policies and standards include our Development Philosophy, Anti-Bullying Policy, Whistleblower Policy, our Ethical and Sustainable Procurement Policy and our Child Protection Policy. Adara is also in the process of introducing a Safeguarding Policy which will set out our commitment to the safety and rights of the communities it assists and the people who it works alongside.

Collectively, these documents, developed with reference to core international standards, such as the Universal Declaration of Human Rights and International Labour Organisation Declaration on Fundamental Principles and Rights at Work, demonstrate Adara’s commitment to an inclusive workplace that treats people with respect and dignity. In particular, they

- promote equality of opportunity for all persons;
- promote a good and harmonious working environment in which all persons are treated with respect;
- preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation;
- allow for lawful affirmative action to be taken, where appropriate.

We actively engage with our partners through formal partnership arrangements and technical exchanges to embed a safe, secure and human rights centred culture in their workplaces. Through our Partnership Guidelines and Know Your Partner procedures, amongst other things, we look at labour practices when onboarding a new partner or renewing an existing partnership agreement. We do not employ forced, bonded, indentured or child labour.

All our staff in Australia and United States of America are covered by an Employee Assistance Programme, and we are actively investigating similar culturally appropriate professional counsellors for our staff in Nepal and Uganda. We respect the right of all employees to choose to belong to a union and seek to bargain collectively.

## 2.2 LABOUR PRINCIPLES IMPLEMENTATION

POLICIES OR PROCESSES	IMPLEMENTATION
Written company policies which comply with national labour laws, supports the UNGC labour principles, and respect	Adara is committed to providing a safe and healthy workplace for all its staff. In addition to the control framework of group wide policies (see above), Adara provides In-country Staff Manuals for each office. These employment handbooks



principles of relevant international labour standards	set out how Adara implements labour policies, reduces labour risks and responds to labour violations in the countries we operate in.
Specific commitments and policies in line with best human resources practice standards	<p>Adara recognises that the physical and mental health and wellbeing of our staff is key to organisational success and sustainability.</p> <p>Adara's Support Leave Policy provides five days paid support leave (every year) for any employee who experiences family violence. This is in addition to any other appropriate assistance provided to an employee in this situation.</p> <p>Adara is also finalising its Health and Wellbeing Policy, to formalise its commitment to building and maintaining a workplace environment and culture that promotes and supports the health and wellbeing of staff.</p>
Risk and Impact assessments in places of work	<p>Adara has a Work, Health and Safety Risk Management Plan, (including a risk register of known hazards and a formal process for reporting hazards, injuries or incidents) for its Global Support Office (GSO). The Plan was prepared in consultation with its employees in the GSO.</p> <p>Each Adara office also has a tailored Emergency Response Plan managed by the staff of the particular office. Each Adara office receives training on the implementing of the Emergency Response Plan.</p>
Allocation of responsibilities and accountability within the organisation	<p>Adara acknowledges that maintaining a safe work environment requires everyone's continuous cooperation. This means that staff are individually responsible for protecting their own health and safety, and the health and safety of other workers and people in the Adara workplaces by working in compliance with Adara policies and safe work practices, and the national law.</p> <p>Adara's Anti-Bullying policy allocates responsibility for all staff to ensure they do not adversely affect the health and safety of others in the workplace.</p>
Process to engage suppliers aligned with our approach	<p>Adara is committed to ensuring that we source products and services from suppliers and partners in an ethical, environmentally and socially responsible manner. In accordance with our Ethical and Sustainable Procurement Policy we strive to work with suppliers whose practices are supportive of our approach and where practicable, encourage ethical, innovative and sustainable behavior among our suppliers.</p> <p>Given Adara's collaborative approach working with our in-country partners, we also seek observance of the principles set out in our Ethical and Sustainable Procurement Policy and encourage our staff to comply with the spirit of the policy in their lives outside work.</p>

## 2.3 ACHIEVEMENTS

The Adara businesses are women owned and/or controlled global financial advisory businesses and reflect a commitment towards inclusion and diversity within the male dominated financial services sector. This commitment to inclusivity carries across our entire organisation where we have strong female representation with 74% of all staff, secondees and volunteers being female. Collectively, across the Adara Development entities 44% of board members are females.

At Adara, we believe there is a correlation between employee engagement and business productivity. It is for this reason, as well as a commitment to the wellbeing of our employees, that we implement strategies and policies that are conducive to a healthy work environment.

We use internal metrics to monitor employee engagement and satisfaction, and diversity and inclusion. Our 2018 staff survey, which was completed by 88% of staff (including staff working in our remote project locations in Humla, Nepal) indicated an overall satisfaction score of 82.6%. Research shows that scores above 75% are an excellent result.

## 3. ENVIRONMENT

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

### 3.1 ASSESSMENT, POLICY AND GOALS

Adara acknowledges the changing global climate and supports businesses taking initiatives to address the risks presented by climate change. Adara is committed to limiting the environmental impact of its operations and promoting environmental sustainability throughout its projects. In September 2019, Adara supported the 'not business as usual' campaign, permitting all its employees to participate in the global climate strikes, without having to take leave.

Climate change presents complex challenges for the communities we operate in. In partnership with our stakeholders, we are managing risk and building resilience to climate change. We understand that climate change is the single greatest challenge in the fight against poverty and inequality. In our latest Global Leadership Team meetings, we strategised how to address the changing climate through our programmes. Going forward, where possible, we will include climate change assessments and initiatives in programme design.

Adara's commitment towards environmental stewardship is captured in our Environmental Sustainability Policy. The policy formalises Adara's commitment to limit the environmental impact of its operations and promotes environmental sustainability throughout its projects.

It is also cross referenced in Adara's Ethical and Sustainable Procurement Policy. This means that suppliers who Adara wishes to work with should, where practicable, recognise and comply with Adara's Environmental Sustainability Policy. As set out in the Ethical and Sustainable Procurement Policy, Adara will strive to work with suppliers who are mission aligned companies, and who produce or deliver goods and services with minimum impact to the environment; comply with relevant local and national environmental protection laws and which strive to comply with international environmental protection standards.

Adara will continue to inspire a commitment to environmental sustainability throughout our offices and project sites, by proactively pursuing a strategy that integrates

- the Ten Principles
- UN Sustainable Development Goals, and
- the high standard of social and environmental performance as a certified B Corporation organisation.

## 3.2 ENVIRONMENT PRINCIPLES IMPLEMENTATION

POLICIES OR PROCESSES	IMPLEMENTATION
<p>Inclusion of minimum environmental standards in contracts with suppliers and other relevant partners</p>	<p>Adara will consider minimum environmental standards in contracts through its due diligence processes for suppliers and other relevant parties, and where practicable will include these requirements in the contracts.</p>
<p>Internal awareness-raising and training on environmental stewardship for employees</p>	<p>Adara has undertaken a number of office-wide environmental policy meetings to strategise the impact of climate change on our business operations.</p> <p>In particular, we held targeted sessions to strengthen the robustness of our programmes, to deal with the challenges of climate change. This included gaining knowledge, adaptive management and establishing strategic partnerships.</p>
<p>Actively pursuing initiatives to reduce waste material and which improve the energy efficiency of products, services and processes</p>	<p>In the offices:</p> <ul style="list-style-type: none"> <li>• where practicable, Adara prints on recycled paper and employees are encouraged to not print and if so to print double sided and in B&amp;W</li> <li>• when catering, Adara does not accept plastic containers, bags, napkins and cutlery</li> <li>• all computers are shut down and screens turned off at the end of the day</li> <li>• discarded office equipment is recycled as e-waste</li> <li>• Adara actively purchases environmentally preferred produce i.e. non toxic janitorial products, recycled environmentally preferred stationary</li> <li>• Adara's GSO has a comprehensive system of recycling and composting waste</li> </ul> <p>When travelling:</p> <ul style="list-style-type: none"> <li>• Carbon offset, where practicable</li> <li>• Required long-haul flights by collaborating team are aligned with trips required for other projects</li> <li>• Adara promotes green commuting: carpooling when travelling; and using public transportation when possible</li> </ul> <p>On project sites, where possible, Adara</p> <ul style="list-style-type: none"> <li>• sources local, sustainable materials to limit environmental footprint</li> <li>• promotes alternative materials for heating and cooking in remote communities, as opposed to use of wood</li> <li>• uses modern technologies to make projects environmentally friendly</li> <li>• protects cultural heritage</li> <li>• encourages local communities to plant trees and plants</li> <li>• uses sustainable, low-impact transportation</li> <li>• uses electronic methods for data collection</li> <li>• supports in-country partner organisations to achieve their environmental goals through knowledge sharing.</li> </ul>

### 3.3 ACHIEVEMENTS

In the last 12 months, Adara has made significant proactive steps to reduce its environmental impact, including

- holding office-wide environmental strategy meetings, whereby staff came together to discuss what more they can do to look after the environment. Staff took on specific responsibilities e.g. making reusable food wraps and contacting community gardens to donate our compost to.
- Adara's Global Support Office now produces more recycling and compost than waste
- recycling soft plastics.
- embedding a 'think before you print' culture across all global offices which has significantly reduced printing.
- developing our child club programme in Humla and Ghyangfedi to encourage environmental stewardship in the younger generation. This includes a number of initiatives, including planting trees and looking after their school and surrounding environments i.e. village clean-up campaigns.

In the lead up to the Global Climate Strike, Adara also took out an advertisement in three of Australia's largest newspapers with 35 other B Corps. The goal was to encourage other businesses to participate in the strike and take climate action. Before these ads, the number of organisations committed to the "not business as usual campaign" sat at less than 700. Afterwards, the number stood at more than 3,000.

## 4. ANTI-CORRUPTION

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

### 4.1 ASSESSMENT, POLICY AND GOALS

Adara is firmly committed to operating with integrity and maintains a strict stance against bribery and corruption.

The foundation of Adara's position against fraud, bribery and corruption is outlined in our Anti-Fraud, Bribery and Corruption Policy and Control of Funds and Resources Policy. Together, these documents, developed in consideration with the principles articulated in the UN Convention against Corruption, demonstrate Adara's commitment to the highest levels of integrity and ethical standards in all our relationships. In particular, they

- demonstrate Adara's commitment to a high standard of governance and accountability;
- operationalise Adara's business integrity compliance programme;
- strengthen open and transparent dealings with stakeholders.

To supplement these processes, Adara is in the process of finalising a group-wide toolkit of resources focused on identifying anti-money laundering and counter terrorism financing. The toolkit will be introduced at each Adara office with comprehensive training.

Adara has a global whistleblower policy, which operationalises Adara's confidential whistleblowing programme and enables a wide range of individuals associated with Adara, including employees, suppliers, consultants, volunteers and interns/secondees, directors and in-country partners receiving funds from Adara, to report (subject to local law) any concerns about the business or behaviour of individuals in the business.

Adara is also committed to a culture of transparency and encourages its employees to speak up about their issues and concerns, through management or formally through the whistleblower process.

Adara’s dedication to open and transparent dealings with all its development stakeholders is demonstrated in its Open Information Commitment, published on its website. Adara believes strongly in the power of information and knowledge sharing to contribute to positive global change.

<b>4.2 ANTI-CORRUPTION PRINCIPLES IMPLEMENTATION</b>	
<b>POLICIES OR PROCESSES</b>	<b>IMPLEMENTATION</b>
Actions taken to encourage business integrity standards and anti-corruption commitments with partners	Adara is committed to the highest level of integrity and ethical standards in its relationships. We encourage in-country partners to engage in honest and ethical conduct and include minimum business integrity standards (including compliance with anti-money laundering and counter terrorism laws, establishment of adequate controls and processes, and audit rights for Adara) in partnership contracts.
Internal checks and balances to ensure compliance with the anti-corruption commitment	Adara maintains a robust check and balance system over transactions, including utilising dual authorities. All financial information is checked and controlled by our finance and operations teams.
Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice	In addition to Adara’s confidential whistleblowing channel, Adara provides an internal complaints handling process to manage grievances and address questions and concerns in a respectful and fair way. Adara’s complaints handling policy is published on the website, referenced in its annual report, explained to all staff during induction and included in Adara’s partnership agreements. Adara also maintains a confidential, anonymous staff survey every two years, where all staff members can record feedback (including grievances). The communication is anonymous and passed directly to the boards of Adara Group, providing staff with a direct access to the board and allowing the board a mechanism for oversight.
Communication and training for all employees on Adara’s anti-corruption commitment	During the induction process, all new staff are trained in Adara’s governance processes. Specialised training on good governance and anti-money laundering and counter terrorist financing are provided to Adara’s leadership teams, directors (where relevant) and teams which handle money and donations.

## 4.2 ACHIEVEMENTS

Adara has had no incidents of bribery or corruption alleged at the company from either internal sources or external agencies.

Adara also engages external auditors to audit each of its entities, once a year. In Nepal, Adara’s books and accounts are subjected to a statutory external audit by the Social Welfare Council, every 2.5 years. These audits are used as one of the methods to identify suspicious payments, allegations of bribery or corrupt behaviour. There have been no such incidents reported via the audit process.