



Nextgen Clearing UN Global Compact Communication on Progress

Document Classification:	Internal Use
Document Ref.	IMS26008
Version:	1.2
Dated:	21 November 2019
Document Author:	Chris Walker
Document Owner:	Compliance
Applicable Region:	Global



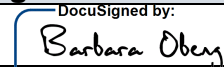
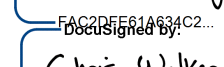
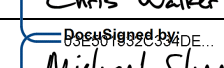
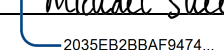
Revision History

Version	Date	Revision Author	Summary of Changes
V0.1	12 th Oct 17	Chris Walker	Draft Version
V1.0	6 th Nov 18	Chris Walker	Various updates and amendments
V1.1	6 th Nov 18	Barbara Obeng	Update from HR
V1.2	21 st Nov 19	Chris Walker	Review and Update for 2019/2020

Distribution

Name	Title
All Nextgen	All Employees and Interested Parties

Approval/Reviewed

Name	Position	Signature	Date
Reviewed Barbara Obeng	HR Manager	 DocuSigned by: Barbara Obeng	28-Nov-2019
Reviewed Chris Walker	Head of Compliance	 DocuSigned by: Chris Walker	28-Nov-2019
Approved Mike Sheehy	CEO	 DocuSigned by: Mike Sheehy	04-Dec-2019
		 DocuSigned by: Mike Sheehy	

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1 CEO's statement of continued support for the Global Compact

Nextgen Clearing has been a signatory to the United Nations Global Compact since January 2018 and we have pleasure in conveying our 2nd Communication on Progress. Being a signatory to the UN Global Compact enables us to demonstrate to all of our stakeholders our commitment to be a sustainable business so that we can continue to be a trusted and respected global organisation in the eyes of our employees, clients and other stakeholders. 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.

1.1 Introduction

Nextgen Clearing was established in 2007 in the UK by Kirit Ruperalia. He was approached by key mobile operators who suggested that the industry needed an innovative clearing provider that could truly support the rapid pace of change in the mobile market. He took up that challenge and founded Nextgen Clearing.

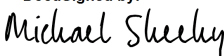
In 2013, Nextgen Clearing recruited some of the most renowned data clearing experts in the industry to create our Data Clearing platform from the ground up. After its launch, we had 9 customers in less than 9 months migrate this fundamental roaming business function to us.

We strive to be the best in our industry by investing and use our commitment to the UN Global Compact, and associated global frameworks, to help shape our approach. Our activity is aligned with and supports the UN Sustainable Development Goals, focusing on those areas where we can make the greatest contribution. We believe that active dialogue with our people, our clients, our peers, NGO and beyond enriches our understanding of our responsibilities.

1.2 Working in partnership

We deeply believe in the power of listening to ignite the human mind and unlock its hidden potential. Our implementation teams start by listening to our clients' objectives and taking the time to understand the unique challenges they face. These insights can then be taken forward to create a set of solutions for their organisation based around our Financial Clearing, Data Clearing and IOTRON applications.

Today, we're the global expert in mobile roaming clearing solutions, evolving to help operators optimise their business in this continually evolving industry. We are constantly developing new technologies that deliver value to the ever-increasing number of operators that migrate to Nextgen.

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Michael Sheehy CEO



2 Human Rights

Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights
Principle 2	Make sure that they are not complicit in human rights abuses

2.1 Assessment, Policy and Goals

Our equality policy gives consideration to human rights and discrimination. It is implemented throughout the business and outlined in the staff handbook. Our corporate and social responsibility policy is integrated into our daily business activities. Nextgen Clearing aspires to be a leader in social accountability within the mobile roaming industry by promoting a positive culture with respect to human rights and the continuous improvement of working conditions. We believe that all companies have a responsibility to respect human rights in their operations, regardless of the country or context in which they operate. We are fully committed to supporting the protection of human rights and promote and support its principles contained within the legislative policies in accordance with the countries we work in.

2.2 Implementation

We continue to promote our commitment to the Universal Declaration of Human Rights to all our stakeholders and openly communicate our objectives. Our Corporate Social Responsibility (CSR) statement is made available on our website. Our equality policy also considers human rights and discrimination and it is implemented throughout the business and outlined in the staff handbook. Our corporate and social responsibility policy is integrated into our daily business activities. Our management team continue to be responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly. All employees receive an induction into the business where our policies, procedures and expectations are outlined. Employee reviews are carried out to monitor the growth and wellbeing of employees. All our policies are reviewed for suitability, sustainability and effectiveness on an annual basis or sooner should a significant change occur.

2.3 Measurement of outcomes

Under the Company Handbook and/or relevant policy documentation there are company procedures for addressing complaints or allegations with regard to Human Rights, which are reviewed annually by Senior Management. The Company Handbook has been reviewed and revised in the past 12 months to ensure all new and existing UK legislation and best practice is incorporated. There have been no legal cases or complaints made against the Company in the area of Human Rights.



3 Labour

Principle 3	Business 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
Principle 6	the elimination of discrimination in respect of employment and occupation

3.1 Assessment, Policy and Goals

Nextgen Clearing complies fully with all aspects of UK labour law and/or in accordance with the country in which we are working in. Nextgen Clearing clearly sets out its policies to all employees by providing a contract of employment clearly stating their terms and conditions of employment with clearly stated pay rates, sick leave, maternity and paternity leave, etc and also refers to the Staff Handbook and/or relevant guide where additional information can be found regarding these policies, principles, commitment and procedures.

3.2 Implementation

Nextgen Clearing maintains and continues to develop a comprehensive recruitment procedure and complies with the UK laws and regulations in all aspects. Records are maintained within the HR department. We monitor all areas concerning Labour Principles and aim to continually improve processes and policies. All our employees and associates are provided with excellent working conditions, including payment of wages and benefits that comply with applicable laws and regulations. We are committed to ensuring that our operations do not contribute directly or indirectly to human rights abuses and will not engage with any organisation that does not uphold their social responsibility to basic human rights which includes any form of forced labour, physical punishment or other abuse.

3.3 Measurement of outcomes

There have not been any legal cases brought against the company in the area of labour relations. Labour principles are reviewed regularly by Senior Management.

4 Environment

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



4.1 Assessment, Policy and Goals

At Nextgen Clearing we continuously strive to improve our environmental performance and recognise the growing importance of our responsibilities around environmental issues and the community and world that we live in. All our employees have a general duty of care and are required to take all reasonable steps to comply with our environmental policy and agreed procedures, and to demonstrate a personal commitment to a safe environment at all times. We are committed in promoting environmental awareness ensuring that we comply with all relevant legislation and, where no legislation exists, we set our own standards. As we work internationally, we strive to make ourselves aware of global and regional specific codes of conduct wherever we operate, and we achieve this by utilising a host of supporting services including government agency websites and third-party consultants.

4.2 Implementation

Our Environmental policy is made available to employees, associates and to all stakeholders and to the public upon request and whilst our environmental impact is minimal, we aim to recycle as much as possible. We have and continue to ensure our employees are aware of our environmental procedures in order to reduce waste and increase recycling. Our employees and those that we work with all reasonable steps to comply with our environmental policy and agreed procedures, and to demonstrate a personal commitment to a safe environment at all times.

4.3 Measurement of outcomes

The Environmental Management Policy is subject to annual review by Senior Management.

5 Anti-Corruption

Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.
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5.1 Assessment, Policy and Goals

Nextgen Clearing is committed to conducting all of its business transactions in an honest and ethical manner. We hold anti-corruption principles and procedures in order to promote honest and ethical conduct and ensure compliance with applicable laws, rules and regulations as set by UN Convention against corruption. Nextgen Clearing has anti-corruption principles and procedures set out in its Company handbook and/or relevant policy documents.

5.2 Implementation

Nextgen Clearing has established appropriate training as a key component of its induction and ongoing training for employees. Nextgen Clearing continues to maintain financial control of all employee expenditure and other expenses, to ensure that spending is transparent. Our code of conduct states that bribery and the making of facilitation payments or 'kickbacks' are unequivocally unacceptable. We have a zero-tolerance approach to bribery and corruption which is communicated to all suppliers, contractors and business partners at the outset of our business



relationship with them and as appropriate thereafter. As an ethical business Nextgen Clearing ensures that our business interactions do not infer any type of corruption. The organisation regularly bids for work through transparent tender processes. Nextgen Clearing has a fully integrated finance system which will help to further eradicate any additional risks and enhance our procedures in this area.

5.3 Measurement of Outcomes

There have not been any legal or other cases brought against Nextgen Clearing during the company's existence. Training on this policy forms part of the induction process for all new workers. All existing workers receive regular, relevant training on how to implement and adhere to this policy. The Head of Compliance and Head of HR have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.