

From 2019-05-04 to 2020-05-04

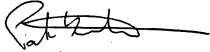
05/04/2020

To our stakeholders:

We are pleased to confirm that Bolton International reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-corruption.

In this annual Communication in 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 communications.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Patrick Linton', with a long horizontal stroke extending to the right.

Patrick Linton

Chief Executive Officer

Human Rights

Assessments, policy and goals

Bolton International's policies support the Universal Declaration of Human Rights.

As written on the Company's Code of Conduct:

Bolton International is committed to a work environment that is free from discrimination on the basis of race, religion, color, creed, national origin, age, sex, disability, veteran status, or other unlawful factors. This relates to all aspects of employment and personnel management, including hiring, wages, promotions, benefits, transfers and terminations.

All employees perform the work they do with full consent. Bolton International's employees sign contracts that clearly state their work hours, work load, and compensation. In the event they are dissatisfied with any aspect of their job, they are free to discuss a resolution with their manager and with HR. If a resolution through simple discussion cannot be done, employees are allowed to file grievances.

Bolton International is committed to uphold the rights and dignity of all its employees through a creation of a work environment characterised by professionalism, fairness, openness, trust and respect. With that, we have policies built on protecting employees from various type of abuse, including violence of any form, and sexual harassment.

Implementation

Hiring Process

We base our hiring decisions solely on skills, experience, and competencies of applicants. Selection criteria and procedures are kept under review to ensure that individuals are selected, employed, appraised, promoted and otherwise treated on the basis of their relevant merits, abilities and aspirations. All employees are given equality of opportunity and encourage to progress within the organization.

Policies for Security

As per company's Code of Discipline, Bolton International bans unruly conduct or any act of that causes disorder, disrupts work, or create scandal in grounds. The first offense warrants a written warning, and the second offense warrants penalties up to and including dismissal.

Statement Against Sexual Harassment

Bolton International's Code of Conduct explicitly states rules against sexual harassment:

The Company values the dignity of every individual, enhances the development of its human resources, guarantees full respect for human rights and uphold the dignity of its employees. All forms of sexual harassment in the workplace are declared unlawful.

This policy is pursuant to Republic Act 7877, the "Anti Sexual Harassment Act of 1995," which defines sexual harassment and enumerates procedures for handling and investigating sexual harassment cases.

Measurement of outcomes

We at Bolton International monitor our growth, not only in numbers, but also in the scope of diversity that our organization covers. The company comprises people of various backgrounds, various culture, and various skillset.

Bolton International fosters a culture of respect and teamwork. Teams communicate constantly, for collaboration and monitoring each other's satisfaction levels in the workplace and compliance with the company policies, including the rules against discrimination, violence, and sexual harassment. Each employee is free to voice any concern and resolve these issues with their supervisors and with HR. In the same token, they are free to report any violations of company rules.

Labour

Assessment, policy and goals

Bolton International believes that association and collective bargaining are fundamental employee rights. Presently, Bolton International's employees individually discuss work conditions, employee relations, and terms of employment with their supervisors and with Human Resources. All employees are allowed individually to file grievances. While there is currently no trade union present, the company puts no ban on its establishment.

The company upholds the elimination of forced labor. All Bolton International employees are compensated for the work they do, at rates and during hours that are agreed upon before they sign their work contracts. All employees have freedom to end their employment to Bolton International, provided they follow the clearly enumerated exit procedures in Bolton International's Employee Handbook.

Bolton International recognizes international and local laws on child labour. The company fully supports and implements these policies.

We ensure that no job applicants or employee receives less favourable treatment on the grounds of gender, colour, nationality, ethnic or national origin, marital status, sexually, religion, political belief, or disability (compatible with the employment concerned) or to be disadvantaged by criteria which cannot be shown to be justifiable in terms of good employment practice.

Implementation

Grievance Procedure

Issues that may arise between employees, including between manager and subordinate, are generally resolved between the concerned parties. However, if any disagreement cannot be resolved privately, the offended employee can file a grievance.

The employee must first inform the supervisor of the concern, either by email or verbal discussion. Their supervisor must then respond to the concern within three working days or any timeframe agreed upon.

Should the employee be dissatisfied with their manager's proposed solution, they may discuss the matter with HR, HR has three working days to respond, unless the concerned employee agrees to a different time limit.

In the event the matter remains unresolved, the Grievance Procedure is considered exhausted and then passed to the Business Manager. After reviewing the correspondence of the Grievance Procedure, which will include a report from HR, the Business Manager decides how to resolve the issue. This decision will be absolute, final and binding.

Compensation

Bolton International pays the employees well beyond minimum wage, pursuant to local labour laws. Regular work time does not exceed eight hours a day, five days a week. Worked hours beyond this limit qualifies as overtime hours. Overtime hours is compensated accordingly, as is work during weekends and local holidays.

Exit Procedure

Employees who wish to resign must submit a letter of resignation dated at least 30 days before the effective date of resignation. They should address the letter to their staff manager and line manager. That letter will be acknowledged with appropriate written acceptance upon recommendation of the manager concerned.

Standard exit procedure includes clearance from all departments, as well as exit interview to ascertain reasons for leaving Bolton International and to determine areas of concern needing management attention.

Age Requirement

Bolton International ensures that all employees are of legal working age according to the local laws and the laws of our customers' respective locations. Additionally, the company is in agreement with Republic Act 9231, which strictly prohibits:

- Child slavery;
- Child prostitution
- The use, procuring or offering of a child for illegal or illicit activities; and
- Endangering children's health, safety, or morals.

As such, Bolton International partners with the companies who also abide the rules against child labour and endangering children.

Work Environment

As per Anti-Discrimination Statement in the company's Code of Conduct, Bolton International commits to creating a work environment free from discrimination. The company's growing family is culturally diverse, as is the company's client base. Rewards and merit are awarded based solely on skill and professional track record.

All employees are encouraged to progress within the company, even if that means working in a different section. Should an employee find better opportunity for growth in another area of the company, they are allowed to request to be transferred to a different department.

Measurement of outcomes

In addition to relying on teams to monitor each other's office conduct and satisfaction levels, Bolton International keeps record of documents submitted and received. HR keep track of:

- Complaints and grievance filed, to track resolved and unresolved conflicts within the company;
- Schedule of payouts and pay slips, to ensure that all dues, salaries, and expenses are paid on time; and
- Official employee records, including social security numbers and tax identification numbers.

Environment

Assessment, policy and goals

Bolton International recognizes the need to be environmentally responsible. As growing company, Bolton International's current environmental actions are small, yet precautionary and concrete. With collaborative tools, the company's collaboration methods among internal teams with customers are mostly paperless.

With that, the company plans on creating more policies and team building activities to support environmental causes.

Implementation

Access to the company's printer is granted to select employees, and all employees are often advised to print documents only when necessary. Sharing documents and collaborating within teams are often done online, either through email or instant message.

Measurement of outcomes

The company's environmental initiatives ensure a clean and safe workplace, as well as lower consumption of printing supplies and less solid waste.

Anti- Corruption

Assessment, policy and goals

Company policy encourages staff to report promptly any potential illegal, improper and/or unethical conduct that they become aware of at their workplace or in connection with their work (i.e. wrongdoing). If staff is concerned that reporting to their line management may result in harassment, victimization or undue distress, they may use the anonymous and confidential help line. Such a policy helps uphold the reputation of Bolton International, its staff and maintain public confidence.

A wrongdoing may include, but is not limited to, one or more of the following:

- fraud, which includes but not limited to
 - deliberate asset overstatement/liability understatement
 - improper management estimates
 - improper accounting, including intercompany accounting
 - improper disclosure (e.g. misrepresentation of the company through news reports or misrepresentation in management discussion)
 - asset misappropriation
- money laundering
- commercial bribery
- expense fraud
- insider trading
- improper related party transactions
- intentionally or recklessly prejudicing Bolton International's reputation or relation with clients/suppliers
- breach of confidentiality and breach of data protection laws (e.g. DPA Act)
- an unlawful act or omission, either civil or criminal
- endangering the health or safety of an individual or individuals
- a failure to comply with a regulatory duty
- or a deliberate cover-up of any wrongdoing.

Implementation

Bolton International conducts its business as a reasonable member of the business and wider community. We take measures to ensure all company activities are within the bounds of good business ethics. This starts with the way we communicate. We ensure any of the statement from us is true to the best of our knowledge, and we immediately correct any discrepancies found.

Violation of any our policy, including the ones pertaining to anti-corruption, subjects offending employee to disciplinary measures. The disciplinary measures are generally aimed to correct mistakes that employees may have committed, but may also be punitive in cases where the offenses is so gross, reprehensible or pernicious, or where the offender has shown a habitual pattern. Due process is observed at all times.

Measurement of outcomes

Bolton International's culture of teamwork allows employees to take accountability for themselves and their teams. As such, our employees understand that they are to report any instances of corruption or any other wrongdoing done in malice. All reports are kept on file, for reference on how to handle cases of wrongdoing, and as a means to measure the company's compliance with the Code of Discipline.

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SENT

05 / 04 / 2020
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VIEWED

05 / 06 / 2020
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Viewed by Patrick Linton (patrick.linton@boltonremote.com)
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SIGNED

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The document has been completed.