

COMMUNICATION
ON PROGRESS



**United Nations Global Compact
Communication on Progress Report**



Atalian Global Services Myanmar

"The Workers of Myanmar"

May 2020

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2. Statement of Managing Director

To our Stakeholders,

I am pleased to confirm that Atalian Global Services Myanmar reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. This is our first advanced Communication On Progress submission. We have made strides to improve our management systems and the initiation of a monitoring and evaluation system. We ushered in a new dedication to environmental stewardship in our organization. Our advances as an organization integrated the Global Compact and its principles into our business strategy, culture and daily operations. We are also committed to share this information with our stakeholders using our primary channels of communication.

Yours sincerely,

Adam Castillo

Managing Director

Atalian Global Services Myanmar

3. Atalian Global Services Myanmar

With a turnover of 2.695 billion EUR (2018) more than 125 000 employees and a presence in 32 countries Atalian Global Services is one of the largest Facility Management providers in the world. The Group boasts more than 32 000 customers in both the private and public sectors and offers a number of key service lines.

Our Services



Integrated Facility Management



Reception and Staffing Services



Cleaning



Technical Maintenance



Security and Safety



Landscaping

Countries of Operations

Atalian Global Services Myanmar (AGSM) is part of the Atalian Group which is present in more than 30 countries across Europe, South-East Asia, North America and Africa.

32 Countries
4 Continents



AGSM in Myanmar

AGSM has its headquarters in Yangon, Myanmar but we offer our services country-wide. In Myanmar, AGSM provides:

- Integrated facility management
- Soft services
 - Cleaning
 - Security and Safety
 - Reception and Staffing Services
- Hard service:
 - Technical maintenance.

All of our integrated services can be tailor made solutions.



Myanmar Key Figures



2 Million USD Turnover



70 Clients



800+ Employees



5 Service Lines

4. AGSM Communication on Report: An Overview



Since 2014, Atalian Global Services Myanmar (hereafter “AGSM”) has committed to meet the requirements of the United Nations Global Compact (UNGC) status “active”. The reporting year of 2019/20 marks the year in which AGSM submits its first stand-alone “Communication on Progress” Report and leaps from the UNGC differentiation level “active” to “advanced”.

AGSM has worked relentlessly to improve and extend its efforts in Human Rights, Labour, Anti-Corruption and Environment. As a security, cleaning and facility management service provider with a strong focus on security services, AGSM inherently emphasized the importance of respecting Human Rights, Labour and Anti-Corruption. This reporting period, AGSM focused on improving its Human Rights, Labour and Anti-Corruption policies, management systems and monitoring and evaluation processes. What is new in the reporting period 2019/20 is that AGSM extended its environmental commitment. With a stand-alone, comprehensive environmental policy AGSM initiated the establishment environmental management and monitoring and evaluation systems to assure compliance with our new environmental policy.

This year’s reporting period will set the base year of measuring the effectiveness and efforts within the area of human rights, labour, anti-corruption and the environment. Over the following reporting periods our stakeholders will be able to track and follow our progress through our annual COP-Reports on the UNGC platform.

4. Sustainable Development Goals

AGSM's Focal Sustainable Development Goals

At AGSM, we understand the importance of the United Nations Sustainable Development Goals as an urgent call for action and change. For us, SDG 8 “Decent Work and Economic Growth” represents a central goal. As a service provider within security, cleaning and facility management our employees are the core of our business. Especially in Myanmar context of a developing country it is of utmost importance for AGSM to provide decent employment opportunities. Our workforce is inclusive of vulnerable and marginalized groups which are often denied decent working conditions. We are striving to change this situation and provide our employees a safe workplace in which everyone has the equal opportunity to thrive. Thus, with SDG 8 as a central goal, SDG10 “Reduced Inequalities” represents an essential part.



AGSM's Complementary Sustainable Development Goals



More specific to our cleaning services, AGSM has the objective to be more inclusive of:



- SDG 13 “Climate Action”
- SDG 14 “Life Below Water”; and
- SDG 15 “Life on Land”.



We believe our cleaning services have the highest impact on these SDGs. We are committed to minimize our potentially adverse impact on the climate, life below water and on land.

In the reporting period 2019/20 we were dedicated in continuing to align our corporate goals with the SGDs. AGSM initiated the documentation, tracking and recording our performance in order to be able to measure our continuous progress by determining specific indicators.

5. Implementing the 10 UNGC Principles

**Mainstreaming
COPs**

Our commitment in implementing UNGC 10 Principles and demonstrating our commitment through the COP Report involved measures to integrate the COP to our daily business. The responsibility for the integration of the 10 Principles lies first and foremost in every individual employee. Our management has the responsibility to enhance our corporate effort in emerging into a more sustainable business. As of 2019/2020, AGSM’s Human Resources team oversees reporting channels and are the first contact point for sustainability matters. In order to initiate, oversee and evaluate our sustainability efforts, we create four sustainability committees, consisting of 3-4 employees:

**AGSM
Committees**



Human Rights
Committee



Anti-Corruption
Committee



Labour Rights
Committee



Environmental
Committee

**Committee
Responsibilities**

These committees are responsible in coordinating and strategizing AGSM’s sustainability goals, timelines and metrics in collaboration with the management team. All our departments receive training within the next reporting period in order to understand the specific roles and responsibilities of the department and its representatives. We strive that every employee is aware and committed to fulfill their sustainability responsibilities. Only with their support AGSM will be able to reach its sustainability objectives.

**Training for the
Committees**

To ensure that all Committees have the capacities to fulfill their responsibility as Committee members, elected employees received annual trainings related to the area of expertise of their Committee. The first training takes place before the Committee members officially form the Committee and then received annual refresher trainings.

Collaboration

We understand that collaboration with internal and external stakeholders is important in order to substantiate the positive impact we intend to have. This reporting period we started communicating our policies to our suppliers and relevant business partners. We have integrated our minimum sustainability expectations towards business partners, suppliers, contractors and clients in our service contract. We understand, that adapting to sustainability expectations is not always feasible in the full extend. However, we are dedicated to support our stakeholders in this transformation period through an open and collaborative approach. This means that we acknowledge their small steps and changes and provide guidance where possible and desired.

5.1 Human Rights

5.1.1 Human Rights Policies

AGSM Policies

As a private security provider, AGSM is aware of potential adverse human rights impacts of private security providers. Thus, respecting human rights has always been our absolute priority and has been reflected in our policies and processes since our establishment in Myanmar:



Human Rights Policy



Use of Force Policy



Child Labour Policy

Additional References

As we strive to improve and learn continuously, AGSM initiated action to further consolidate our compliance with internationally recognized human rights standards. As a first step we included more detailed reference to all applicable laws and internationally recognized human rights standards in all our policies related to human rights to demonstrate AGSM's commitment to our employees and clients. The recent adjustments aim to reinforce our commitment to the Universal Declaration of Human Rights and the Voluntary Principles on Security and Human Rights. This reporting period re-emphasizes our commitment on:



Equality and Non-Discrimination



Freedom of Expression and Opinion



Slavery and Forced Labour



Employment



Use of Force



Interactions between companies and private security providers



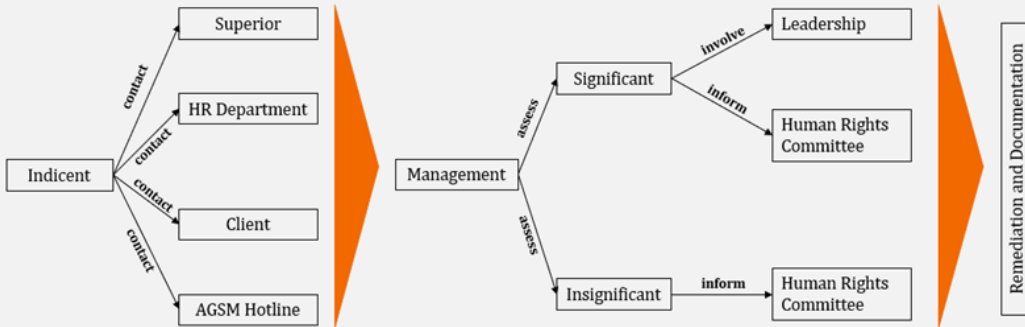
Freedom of Association

Additional References

In addition to the adjustments, we included our commitment to the International Code of Conduct for Private Security Providers as a guidance for our code of conduct of personnel and to strengthen our commitments regarding management and government.

AGSM Reporting System

Our human rights related policies are unconditionally supported and enforced by AGSM’s Managing Director and all employees. Our expectations to respect human rights applies throughout all AGSM service lines. In 2020, AGSM extended its reporting, recording and documenting methods to better track potential non-compliance and challenges including but not limited to human rights.



If an incident occurs, employees must contact their superior, AGSM’s HR Department, the responsible client’s department or the AGSM Hotline. The incident will then be reported to the management which will assess whether the incident is significant or not. If the incident is significant, the leadership will be involved, and the Human Rights Committee informed. The Human Rights Committee will be informed regardless of the severity of the incident and will initiate the remediation and/or documentation of the case. Each non-compliance or incident is documented in a database which is overseen by our operational manager and reviewed by the Human Rights Committee.

Communication of Policies

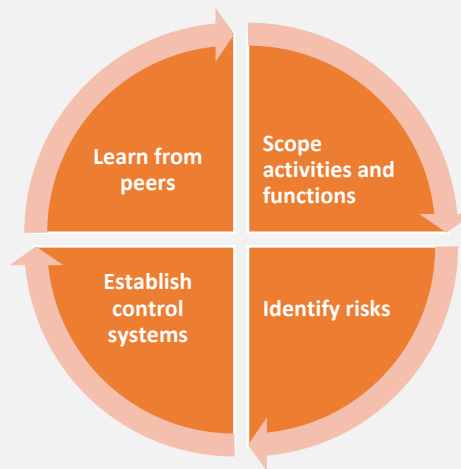
With the objective to be more transparent towards our stakeholders, we uploaded all policies, including our human rights policies to AGSM’s website. We communicated changes to all internal and external stakeholders through public announcements on our website and social media channels on a quarterly basis. Our employees are informed about these minor policy changes in a townhall meeting, through notice board announcements and complementary emails quarterly. During the townhall meetings our employees provided feedback forms in order for us to understand the effectiveness of changes and our communication methods.

5.1.2 Management and Monitoring of AGSM’s Human Rights Commitment

Management of Human Rights Policies at AGSM

Reporting and Documenting Systems

Until today, AGSM has diligently handled incidents related to human rights. At AGSM we recognize not only the importance of continuous improvement and adaptation of our policies but also the need of their management to guarantee effective implementation. This reporting period, AGSM commits to establish and extend its reporting and documenting methods as a foundation to better track potential non-compliance with the policies in the future. One of our approaches to ensure and manage our commitment is to apply the Business Leaders Initiative on Human Rights (BLIHR) . With these guidelines we plan to strategically assure compliance with human rights standards by:



BLIHR Matrix

Furthermore, we apply the BLIHR Human Rights Matrix¹ to identify relevant risks, opportunities and processes. We chose this Matrix because it supports our understanding of which actions are essential, expected and desirable to comply with international and national human rights standards. For the reporting period 2019/2020 we comply with the “essential compliance” and partially with “expected compliance” suggested by the matrix. Our objective for the next reporting period is to meet the requirements of “expected compliance” suggested by the Matrix. We use the Matrix’ indicators to measure our overall progress:

- General obligations;
- Right to equal opportunity and non-discriminatory treatment;
- Right to security to persons;
- Rights of workers;
- Respect for national sovereignty and human rights;
- Obligations with regard to customer protection;
- Obligations with regard to environmental protection; and
- General provisions of implementation.

¹ <https://www.ohchr.org/Documents/Publications/GuideHRBusinessen.pdf>
https://www.jussempo.org/Resources/Corporate%20Activity/Resources/GIHRBM_Matrix.pdf

ISO 18788

We included the requirements of ISO18788 “Management System for private security operations — Requirements with guidance for use” to guide the Human Rights management process at AGSM. We believe, ISO 18788 will support AGSM with a framework for the management of AGSM’s security services.

Assessment of Key Issues

AGSM reviews and reassesses its existing human rights management processes and adjusts any processes when required. Based on the “Human Rights Compliance Assessment (HRCA) Quick Check” tool the Human Rights Committee identifies the required assessments of key human rights issues in the areas of:

- Employment practices;
- Community impact;
- Supply chain management,

Human Rights Committee

By March 2020, the Human Rights Committee established and consisted of four staff members: one employee each for the cleaning and facility management services, two employees from the security service lines. We decided that 50% of the committee should be represented by our security staff since this service line represents a high-risk area for human rights. The two security committee members represent the management and operational level. The Human Rights Committee will be responsible to conduct the human rights assessment in collaboration with operational managers and senior staff. The Human Rights Committee reports to the managing director on a monthly basis. In March 2020, AGSM started to document the results of the assessment to allow progress tracking over time.



Operational-level Grievance Mechanisms

AGSM introduced operational-level grievance mechanisms following “The Guiding Principles on Business and Human Rights” with a focus on employee complaints. The internal complaint system is confidential, and complaints are assessed at the management level. We highlight the importance of collaboration and intend to work together with the complainant on a solution. Additionally, AGSM has remediation processes in respect to human rights violations. Existing remediation processes are reviewed and improved or extended where required.

Human Rights Training

Currently, human rights training specific to security matters is provided to security staff. In order to increase the understanding and awareness among AGSM’s management and employees, AGSM extended its training curriculum to all employees in the form of a general human rights training based on internationally recognized

standards. The extended training has been implemented as of March 2020. These trainings will be leveraged to ensure all staff are aware of their own roles, responsibilities and accountability for addressing human rights impacts throughout all of AGSM's service lines. Operational staff were trained to recognize potential non-compliance at their working site while administrative and management staff are trained to respond appropriately to reported violations. AGSM has planned and executed a 2020 Training Schedule for its senior and mid-level management staff to attend external training relevant to the 10 Principles of the UNGC. Among others, we identified human rights trainings and events. The availability of external trainings will be continuously screened, and our schedule will be regularly updated by our communications officer.

Monitoring of Human Rights Policies at AGSM

"RIGHTS"
Principle

We are not only committed to introduce and extend management systems, but we want to ensure that our systems are functioning and are effective. In 2020, AGSM committed to improve its monitoring and evaluation processes in order to ensure compliance with its human rights policies and to track our progress. To reach our objectives, we decided to determine our human rights indicators according to the OHCHR's "RIGHTS" principle:

- R** Relevant and Reliable
- I** Independent
- G** Globally meaningful but amenable to contextualization
- H** Human-rights standard-centric
- T** Transparent, timely, time-bound
- S** Simple, specific

Indicators

As of 2020, we are dedicated to diligently document and track human rights related grievances and incidents to understand our progress over time through indicators including but not limited to:

- Number of incident reports;
- Number of grievances;
- Process status of grievances;
- Number of reported incidents;
- Severity of reported incidents; and
- (Average) processing time of reported incidents.

Review of Performance

These indicators and metrics support us to understand our human rights impact and effectiveness of our reports. For this data, the base year is 2019. AGSM's leadership will regularly review incidents and grievances rated as significant incidents. The Human Rights Committee and management will present the results of the monitoring and improvement results to the leadership level and discuss the outcomes on a quarterly basis. Based on these quarterly meetings, leadership, management and the Human Rights Committee discusses adjustments in the existing systems and procedures.

Feedback System

We introduced an internal and external feedback system. Our internal feedback system is connected to our training programs for all our staff in the form of evaluation and feedback forms after trainings. Additionally, employees that report an incident or grievance are invited to a meeting after their case is closed to receive direct feedback and are encouraged to fill in a feedback form to assess AGSM's remediation approach. AGSM values the feedback of our employees and continuously integrate lessons learned into our corporate strategy. Annually, our clients are asked to fill in an evaluation form to assess AGSM's performance regarding the 10 Principles of the UNGC.

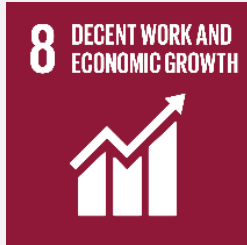
Communication of Monitoring Results

In 2020/21, AGSM dedicated to measure our human rights performance in order to efficiently report the outcomes of the integration of human rights principles on our webpages, newsletters, annual reports, sustainability reports and future COP Reports to our external and internal stakeholders.

5.2 Labour

5.2.1 Labour Policies

SDGs,
International
Standards
and Local
Laws



In line with SDG 8, we are committed to provide decent employment opportunities in Myanmar and strive to uphold the high labour standards throughout all service lines. This includes employment opportunities for vulnerable groups such as women and migrants while providing equal pay for work of equal value. With SDG 8 “Decent Work and Economic Growth” at the core of AGSM, respecting internationally recognized labour standards is critical to us. AGSM’s labour policies are guided by the ILO Convention and follow Myanmar Labour Laws. Although we commit equally to all ILO Conventions, in this reporting period we identified eight Conventions which are particularly relevant for our business:

- No. 87** Freedom of Association and Protection of the Right to Organise Convention (ratified by Myanmar)
- No. 98** Right to Organise and Collective Bargaining Convention
- No. 29** Forced Labour Convention (ratified by Myanmar)
- No. 105** Abolition of Forced Labour Convention
- No. 138** Minimum Age Convention committed to specify which ILO Conventions are particularly relevant for the nature of our
- No. 182** Worst Forms of Child Labour Convention (ratified by Myanmar)
- No. 100** Equal Remuneration Convention
- No. 111** Discrimination (Employment and Occupation)

References
and
Prioritization

Having this focus within our labour policies guides us in prioritizing our actions towards labour improvements. In addition to this focalization, we decided to integrate the International Code of Conduct for Private Security Providers in our labour policies for guidance regarding code of conduct of personal and determining our commitments towards management and governance. This constitutes an elementary step towards further specifying labour principles for our security service line in the future.

Third Parties | We have announced our expectations towards business partners, contractors, supplier and clients to comply with international labour standards in our service contracts upon contract signing and renewal.

Proactive Engagement | In order to be always informed about updates in standards, laws and policies and emerging labour innovations in the business spectrum, we have actively engage in labour related events and platforms. We have become a proactive member of a labour right related platforms and be a regular guest at labour related events in Myanmar and the region.

5.2.2. Management and Monitoring of AGSM’s Labour Commitment

Management of Labour Policies at AGSM

ILO 5 Step Guide | As the first step to initiate improvement in our labour rights related performance, AGSM conducted a labour risk assessment to fully understand our impact. The risk assessment conducted is based on the ILO 5 Step Guide:



Confederation of Trade Unions Myanmar | We are committed to establish a relationship with the Confederation of Trade Unions Myanmar in order to regularly discuss opportunities of how to consolidate our efforts to improve labour right conditions in Myanmar.

Anti-Corruption Training | This reporting period, we introduced a section on Anti-Corruption in our job commencement and refresher trainings with the goal to increase the awareness of our employees towards corrupt behavior. In these trainings, our employees learn that everyone as an individual has the responsibility to avoid and stop corrupt behavior. Additionally, an Anti-Corruption committee with employee representatives oversee AGSM’s Anti-Corruption activities and counsel employees when they are in doubt. When employees or other stakeholders wish to report incidents, they can use our local whistleblower channel which is directed to our Human Resources department. Alternatively, our staff may report these incidents through the global Whistleblowing

Hotline of Atalian. The contact details are accessible through our publicly available policies.

Third Party
Contracts

As of 2020, we have included ILO Labour Standards and Myanmar Labour Law references in our contracts with our contractors, suppliers, business partners and clients to express our expectation to comply with minimum labour standards. (L7.3) We also wish to establish a relationship with the Confederation of Trade Unions Myanmar in order to regularly discuss opportunities how to consolidate our efforts to improve labour right conditions in Myanmar.

Monitoring of Labour Policies at AGSM

Annual
Employee
Feedback

With labour standards and SDG 8 as the core of our businesses we strive to monitor and evaluate our performance in participation with our employees. Through annual employee feedback we measure and document:

- Employee satisfaction;
- Employee expectations;
- Lessons learned;
- Suggestions;
- Perceived working conditions.

Anti-Corruption
Committee

The Anti-Corruption Committee meets quarterly with AGSM’s management and leadership in order to discuss the findings of the Committee’s monitoring activities. In collaboration, they strive to address labour related challenges. The Anti-Corruption Committee’s main objective for this last reporting period was to strategize and plan how AGSM can facilitate the creation of a workers’ representative body. The outcome of our monitoring activities were shared publicly on our corporate website.

Third Party
Assessment

For the next reporting period, we assessed how our external stakeholders such as business partners, suppliers, contractors and clients are reviewing and monitoring their labour law compliance. Based on our assessment results we provided them with recommendations for improving their compliance with labour law standards.

5.3 Environment

5.3.1 Environmental Policy

Stand-alone
Policy

Until 2020, AGSM only had an integrated Health, Safety and Environment Policy. Today, we understand our potentially adverse environmental impacts better and are dedicated to commit to reducing our impact. The first step towards consolidating our environmental stewardship was to increase our environmental commitment through a stand-alone environmental policy. In our environmental policy, we are stating our commitment to international standards (ISO14001) and conventions. However, our new environmental policy also demonstrates our current and planned management systems and monitoring and evaluation frameworks. These are included in the policy to transparently communicate and ensure the appropriate implementation of our policy to protect the environment by minimizing our potentially adverse environmental impact. In the process of developing our environmental policy we assessed which of our service lines has the highest potential environmental impact. This assessment showed that our cleaning services are an environmental high-risk area, whereas our activities within facility management and security represent a low risk area.

Third Party
Contracts

AGSM understands that significant improvements and collaborations in the private sector are necessary in order to curb the climate crisis, environmental degradation and biodiversity loss. As an effort to increase the awareness of our business context, we adjusted our contracts with suppliers, contractors, clients and other business partners by including minimum environmental standards in the reporting period 2020/21. For example, the contracts included reference to national laws and regulations as well as international standards. Additionally, the contracts outline our expectations towards third parties to commit, manage and monitor their environmental impact (i.e. environmental policy). This means that in the next reporting period, new and renewed contracts included environmental minimum standards to which all contracting parties shall commit.

5.3.2 Management and Monitoring of AGSM’s Environmental Commitment

Management of AGSM’s Environmental Policy

Environmental
Committee

In March 2020, we have created a Environmental Committee with the responsibility to enhance and implement our environmental objectives and conducting the monitoring and evaluation of our environmental performance. The Environmental Committee is overseen by AGSM management and the leadership.

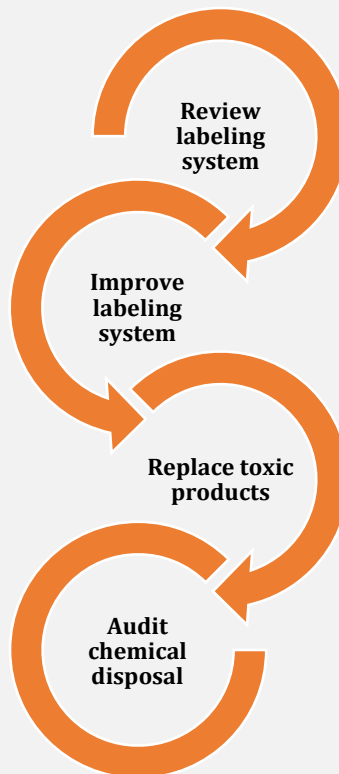
Environmental
Risk
Assessment

Following the creation of our environmental policies, we conducted an internal environmental risk assessment which will be conducted by AGSM’s Environmental Committee. This environmental risk assessment’s objective was accomplished by identifying where the highest risks for environmental damages exist:



Cleaning Services

For our cleaning services, we used a significant amount of cleaning products and chemicals. Thus, we decided to:



Lifecycle Assessment

Additionally, we identified the need to assess the lifecycle impact within our cleaning services. However, we also conducted a lifecycle impact assessment of our products used for facility management (i.e. generators).



Training

With the introduction of our new environmental policy, we aim to create a new training session for all employees regarding environmental stewardship and the responsibilities of every staff member to comply. Every employee has at least a basic understanding of what environmental stewardship means within their specific service line and for AGSM overall. The training will include:

- Environmental awareness;
- Air Pollution;
- Water Pollution; and
- Waste and Disposal.

Training Indicators

The newly designed training developed indicators to determine the success and effectiveness of the trainings:

- Knowledge level through pre- and post-tests;
- Facilitator performance through training evaluation forms; and
- Overall employee satisfaction with sustainability changes at AGSM through annual surveys.

Communication and Grievance Channels

AGSM’s Human Resources Department’s responsibility has been extended to overseeing and managing reported environmental grievances and informing responsible management staff about the grievance. The Human Resources Department has functioned as a communication channel for reporting incidents and grievances, including but not limited to environmental incidents and grievances. Our employees have been provided with the contact details of the Environmental Committee to seek advice for environmental impacts.

Monitoring of AGSM's Environmental Policy

Monitoring Approach

With the lack of a stand-alone environmental policy in the past, our monitoring and evaluation efforts were lacking detail and thoroughness. Based on the environmental policy management systems in place, AGSM has benchmarked, tracked and monitored environmental performance against environmental indicators, set objectives and milestones from mid-2020 onward. There are quarterly reviews of the performance to conclude lessons learned and new approaches for improvement. In an annual workshop overall progress, challenges and lessons learned informed by the quarterly reviews are discussed. During these annual workshops, the leadership has shared findings of the monitoring results from the quarterly meetings and bi-annual environmental monitoring reports. The findings from the annual workshop guides AGSM in its annual environmental strategy.

Responsibility of Environmental Committee

AGSM's Environmental Committee has the responsibility to identify and prioritize potential risks and adverse environmental impact within each service line. A list of preventive measures and steps have been developed and our repertoire of Standard Operating Procedures (SOPs) has been extended and optimized by the end of 2020. The SOPs are introduced in all job commencement trainings and through sign boards on site.

Environmental Audits

In addition to our monitoring and evaluation measures we have conducted an internal audit of our environmental performance by the end of 2020. For the following reporting period we strive to involve external auditors to assess our environmental performance independently.

Communication

In the next reporting period 2020/21, we expect to be able to share publicly our environmental progress over the span of a year.

5.4 Anti-Corruption

5.4.1 Anti-Corruption Policies

Policies, Rules and Processes

AGSM has always condemned any corrupt practices and upholds strict, zero tolerance anti-corruption policies. Thus, AGSM has several anti-corruption policies complementing each other.

- Employee Code of Conduct
- Anti-Corruption and Bribery Management Policy
- Conflict of Interest Policy; and
- Gift and Entertainment Policy

These policies are supported by rules, processes and standard agreements as follows in order to prevent corrupt or immoral practices:

- Advanced Money Request Rules and Process;
- Ethics and Moral Courage; and
- Non-Disclosure Agreements

References

In March 2020, we adjusted our Anti-Corruption policy by integrating comprehensively which actions are considered corrupt by the UN Convention on Anti-Corruption. With this basis, we reviewed all anti-corruption policies in collaboration with our operational management in order to identify gaps and add detailed explanations and justifications were needed. In order for AGSM to increase the detail of our policies we applied the UNGC Global Risk Assessment Guideline to conduct an anti-corruption risk assessment. Additionally, we strengthened our commitment for international and legal frameworks. We developed an integrity strategy by the end of 2020 informed by the OECD Recommendation of the Council on Public Integrity to substantiate our commitment.

Policy Applicability

At AGSM, we believe that anti-corruption practices are only as strong as our network. Our anti-corruption policy framework does not only apply to our employees, we expect from our business partners, clients and contractors and equal level of integrity and commitment. Our anti-corruption policies have been adjusted to encourage our business partners to implement anti-corruption commitments that reflect our standards or higher.

Leadership Commitment

All our anti-corruption polices are strongly supported and encouraged by our leadership level. This year, we formally consolidated this commitment on leadership level by a personal statement and signature of the managing director in each of these policies.

Communication and Transparency

By publishing this COP Report, we commit to make all our policies publicly available, including our anti-corruption policies on our website. Our internal and external stakeholders have been informed through e-mails, newsletters and social media posts about new publications and changes in our current policies and their monitoring.

5.4.2 Management and Monitoring of AGSM'S Anti-Corruption Commitment

Management of Anti-Corruption Policies at AGSM

Trainings

Since 2014, we have conducted 15 trainings on anti-corruption which is an integral part of our overall management training. This year, we adjusted anti-corruption training material and extended the trainings to all staff to increase their understanding. Additionally, we introduced a system capturing our training efforts in terms of training frequency and effectiveness.

Integrity

We formally recognized the efforts of our staff to prevent corrupt behavior by including their integrity efforts as an indicator for their performance review. After the implementation of our management systems, we introduced an Integrity Award in April 2020 which is awarded annually to employees that demonstrated high level of integrity throughout a reporting period.

Check and Balance Audit

We conducted an internal check and balance audit to ensure our consistency with our anti-corruption commitment through internal audits. We also had an external auditor to audit our internal checks and balances.

Whistleblowing

Currently, we are exploring an improved integration of whistleblowing channels in our operations. Our Human Resources department will be the first contact for communicating and reporting non-compliance regarding anti-corruption. Our HR department will receive a training to ensure appropriate handling of whistleblowing cases and guarantee discretion. Additionally, our staff may contact the whistleblower channels on the Global Atalian level.

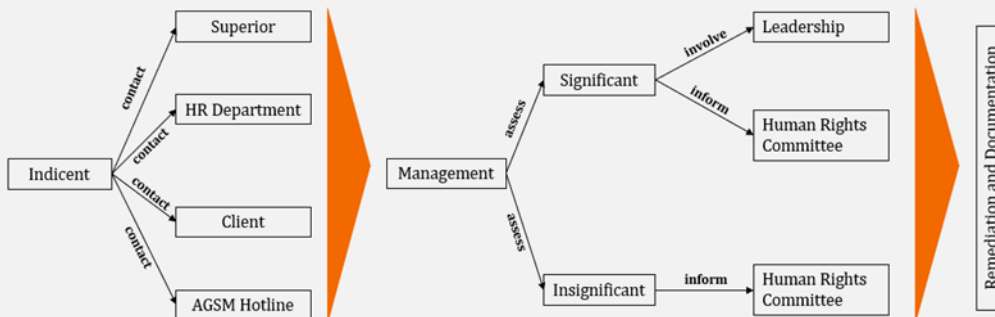
Monitoring of Anti-Corruption Policies at AGSM

Review Processes

AGSM ensured the involvement of the leadership level in monitoring the results of anti-corruption performance monitoring by quarterly meetings between the leadership and responsible management. Annually, AGSM's leadership reviewed the evaluations and all anti-corruption policies to guarantee the policies reflect current performance and international standards. The main role of leadership is to provide quality control and assurance of AGSM's monitoring and evaluation systems in place.

Reporting System

Just as any other incidents, a standardized reporting and handling system is in place for anti-corruption:



Legal Cases and Incidents

We are proud to say that until today, AGSM was not involved in any public legal cases neither related to corruption nor to any of the other focus areas. Nevertheless, we are aware of the importance of transparency if public legal cases occur and commit to full transparency towards our internal and external stakeholders.

0 Incidents

Indicators

This year we commit to establishing a functioning monitoring and evaluation system in order to be able to track the effectiveness of our anti-corruption efforts and performance in the future. Since March 2020, our management team introduced indicators to capture our anti-corruption performance. Throughout the year, these indicators were used to capture any potential misconduct. The derived information has been published in annual reports, sustainability and COP Reports.

6. Disclaimer

Howe Sustainable Pte. Ltd. created this “Communication on Progress” Report on behalf of Atalian Global Services Myanmar. The content of this report is informed by material and information provided by Atalian Global Services Myanmar. The information in this COP Report is created according to the best knowledge of involved consultants.