



The Development Initiative Ltd

Communication on Progress: November 2019 - November 2020





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COMMUNICATION
ON PROGRESS



This is our **Communication on Progress** in implementing the Ten Principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.



Support for the United Nations
Global Compact



Support for the United Nations Global Compact

Saturday 21st November 2020

To our stakeholders:

I am pleased to confirm that the Development Initiative Ltd 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 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 sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'H. Morris'.

Mr. Hugh Morris
Managing Director





Introduction



1. Who is TDI?

TDI aims to mitigate the risk of explosive threats; whether it is landmines in the Democratic Republic of Congo, detection dogs in South Sudan, providing weapons and ammunition management training in the Central African Republic or diffusing improvised explosive devices in Mali. TDI's partnerships expand multinational companies, governmental and non-governmental organisations and since its establishment in 2005, the company has successfully completed over eighty projects in more than fifteen countries in Africa and the Middle East.

Personnel from over thirty-five countries make up the diverse nature of TDI. Each member of staff plays a pivotal role in releasing contaminated land back to communities. The personnel make up the heart of this company.

Explosives devices destroy livelihoods, communities and a country's development and as a company, TDI is committed to reducing the worldwide footprint of these items. TDI's vision is unique; 'to clear the way for business and people.'



2. Strategic Sustainability Framework

Sustainable thinking is firmly embedded at the core of TDI. TDI views sustainability in terms of shared global needs thus, the company is committed to improving the quality of life of the communities it interacts with, aligned with the United Nations' Sustainable Development Goals.

TDI recognises the dynamism of the environments in which it operates and proactively responds to the challenges and social issues through the framework of the Sustainable Goals. TDI's sustainability strategy aligns with the following underlying principles of its business agenda:

› Support for Local Communities

Local communities are always top of mind for TDI. Where possible, TDI strives to build social capacity by utilising local resources whilst providing employment opportunities for communities, imparting skills for future development, prosperity and social inclusion.

› Delivery of Superior Operational Execution

TDI constantly strives to improve its performance and provide the highest quality of service in the industry. A commitment to Health, Safety and the Environment (HSE) is, and continues to be, a principal priority for TDI.

› Inclusion and Diversity

TDI is an equal opportunity employer and strives to increase the enterprise-wide representation of women in its workforce. TDI is committed to building a culturally diverse community with no discrimination to gender, race,



ethnicity, nationality or religious affiliation. This commitment is reiterated in all employment announcements.

During each recruitment cycle, senior management actively encourage the inclusion of women where achievable possible, without compromising their safety and security in the theatres in which TDI operates. Furthermore, TDI aims to provide new job opportunities for local national personnel during mobilisation periods into each theatre of operation.



Section 1

Human Rights



1. Human Rights: doing business the right way, at all times, under all circumstances

Principle 1: *Businesses should support and respect the protection of internationally proclaimed human rights; and*

Principle 2: *make sure that they are not complicity in human rights abuses.*

TDI is committed to ensuring that all staff maintain a high standard of conduct and act with due diligence towards their colleagues and other personnel that they may interact with. All TDI staff, male and female, have the right to work in a safe and discrimination-free environment.

Gender equality and diversity is pertinent to sustainable operational development. TDI, throughout all policies and the implementation of operations, strives to provide men, women, boys and girls in the theatres in which it operates with safer and better living conditions and equal opportunities. The integration of both genders across its operational spectrum in terms of its teams as well as its global footprint is paramount to TDI's ethos. All personnel receive recognition within the company without prejudice towards gender, race, ethnicity, religious affiliation, nationality or sexual orientation.

2. Implementation

All TDI personnel are required to respect the rights of others at all times. Unethical behaviour on the part of staff, contractors, directors or affiliates of the company is not tolerated. The ethical performance of TDI is the sum of all of those who work under its name. TDI has a zero-tolerance policy towards human rights infringement, sexual, physical and mental abuse, sexual trafficking, forced labour, the misuse of private information and whistleblowing.

When joining TDI, all personnel are issued with a TDI Staff Handbook and Code of Conduct. By signing these documents, they acknowledge the policies and directives that make up TDI. All personnel are expected to adhere to the values of TDI, respecting the rights, race, gender and religious associations of their colleagues and those that they meet during TDI operations. When working with third party suppliers, TDI expects that these suppliers uphold the same or similar principles on respecting human rights.

The Universal Declaration of Human Rights

"The Universal Declaration of Human Rights (UDHR) is a milestone document in the history of human rights. It is a common standard of achievement for all peoples and all nations.

All humans are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood."

Amongst the policies detailed in the above-mentioned documents, TDI staff are required to uphold the following directives:

- › Obey all equal employment opportunity laws and act with respect and responsibility towards others in all of their dealings;



- › To be aware of any religious or cultural customs and practices, and to ensure that such customs are respected at all times whether on or off duty;
- › The ethical performance of TDI is the sum of the behaviour of the men and women who work under its badge. All staff are expected to adhere to the highest standards of personal integrity at all times.

TDI operates a strict no tolerance policy on matters pertaining to human rights infringements. It is a dismissible offence that can lead to major contractual ramifications. TDI is at risk due to negligent behaviour by any one of its employees, thus, upholding the company's policies and respecting the rights of others is a companywide action. The prevention, detection and report of abuses within the organisation must be upheld by those working for the company, affiliated to or working under the TDI brand.



3. Disciplinary Procedures

Workplace harassment can take many different forms and is not necessarily always sexual. All TDI staff have the right to work in a safe environment where open communications are the expectation, not the exception. Should a member of staff experience any form of human rights infringement, abuse or harassment, they are encouraged to make a report to their Project Manager, following the stipulated channels. Headquarters staff should relay a report to their immediate Supervisor or Manager in charge. This report will be elevated to TDI's Chief Operating Officer who will commence a formal investigation. Focal points of contact within the TDI organisational structure regarding harassment concerns, strive to remain neutral within the workplace to promote an unbiased environment for all parties.

If staff members feel that they cannot approach their Project Manager or immediate Supervisor with their report for whatever reason, they are encouraged to utilise the Ethics Hotline managed by our parent company, the Constellis



Group. This anonymous report will commence an investigation with the addition of an external third party. Posters are visible in all TDI camps on field-based projects as well as the TDI headquarters to encourage reporting any behaviour that is deemed unethical.

4. Measurement of Outcomes

When operating under the TDI name, human rights infringements and abuses are not tolerated. The tally below highlights how TDI monitors and evaluates its performances regarding human rights:

- › A quarterly review and audit of business practices conducted by senior management to ensure that there are no human rights infringements or unethical business practices taking place;
- › Number of human rights infringements: TDI has an ethics hotline that staff can call which will open a formal investigation into any human rights abuses or harassment. During the period of November 2019 – November 2020, no incidents have been recorded.
- › Number of whistleblowing incidents: TDI operate in an open and fair environment. No whistleblowing incidents have been recorded during this reporting period.
- › Number of staff who have acknowledged and signed the TDI Staff Handbook and Code of Conduct: 564



Section 2

Labour



1. TDI: an Equal Opportunity Employer

Principle 3: *Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;*

Principle 4: *the elimination of all forms of forced and compulsory labour;*

Principle 5: *the effective abolition of child labour; and*

Principle 6: *the elimination of discrimination in respect of employment and occupation.*

TDI supports the labour principles detailed in the United Nations Global Compact and recognises that everyone should be treated with dignity and respect. Respecting diversity is at the core of TDI so as a company; it strives to ensure that no employee or applicant is discriminated directly or indirectly on the grounds of gender, religious beliefs, ethnicity, race or sexual orientation. These grievances are highlighted in the TDI Staff Handbook and Code of Conduct. TDI does not partake in any forms of forced or child labour and complies with all labour laws and standards in the theatres in which it operates throughout the tenure of every contract.

2. Duty of Care

As an international company, TDI has a moral and legal duty of care for the health, welfare and safety of its employees. Many of the company's projects take place in hostile or conflicted environments so it is TDI's responsibility to ensure the continuous safety of its staff. TDI management go to great lengths in creating a safe and secure work environment for its employees to minimise the risks that they are exposed to on a daily basis.

3. Implementation

All employees are informed of the anti-discrimination measures in place within the company when they join TDI. Each member of staff is provided with a TDI Staff Handbook and Code of Conduct, detailing the behaviour expected of them when working under the TDI name.

Other than the TDI Staff Handbook and Code of Conduct, all contracts of engagement detail the expected behaviour when working for TDI. These expectations extend to interacting with colleagues, community members in the theatres in which the company operates and personnel from other corporate organisations, including TDI's competitors.

TDI makes every effort to reflect this dedication to diversity, inclusion and equality in all marketing material and communication activities. In

Diversity and Inclusion

TDI prides itself on being a diverse and inclusive workplace. The company has an ambitious goal to encourage personnel from all nationalities to join TDI.

TDI strives to promote women in the workplace, offering each gender equal opportunities in order to grow and develop within this industry. Diversity is integrated into all human resource processes with the aim to promote international and national personnel in the theatres in which TDI operates.



all documents, gender-sensitive language is used as much as possible to ensure no harm is done to any individuals or community groups that the company may meet.

As part of the on boarding process, all TDI personnel are expected to complete the following courses prior to commencing operations:

- › Prevention of Sexual Exploitation and Abuse;
- › Introduction to Gender and Diversity in the Mine Action Industry;
- › BSAFE Training.

In addition to the above online courses, TDI personnel undergo gender awareness training when they initially deploy with the company. Refresher training is provided every 3 months thereafter. When operating in international countries, TDI ensures that a country's labour laws are followed and all wage brackets are adhered to.

TDI takes all responsibility for ensuring that its staff act with dignity and respect. Whilst the company takes reasonable steps to train and inform staff on its expectations, all employees have a duty to:

- › Respect the rights of their colleagues and other individuals;
- › To treat colleagues with respect;
- › To not discriminate or harass other members of staff.

Any breaches of the expected behaviours may result in disciplinary action against staff and/or the termination of the contract with the individual in question.

4. Measurement of Outcomes

The tally below highlights how the company monitors and evaluates its performances regarding labour principles:

- › Number of staff who have completed PSEA and BSAFE training: 564
- › Number of women employed by TDI: 53
- › Number of local national staff employed by TDI: 213
- › Supply chain management: there has been no record of labour violations with the third party suppliers that TDI works with.
- › Regular review sessions conducted by senior management to ensure that all labour laws are adhered to in the countries in which TDI operates.





Section 3

Environment



1. Working with the Environment

Principle 7: *Businesses should support a precautionary approach to environmental challenges;*

Principle 8: *undertake initiatives to promote greater environmental responsibility; and*

Principle 9: *encourage the development and diffusion of environmentally friendly technologies.*

TDI is committed to minimising its environmental footprint by preventing pollution and implementing practices to promote sustainability. TDI's environmental management policy follows the guidelines of ISO 14001 and IMAS 10.70, with a particular focus on the 12th principle of the Sustainable Development Goals, "responsible consumption and production."



2. Implementation and Environmental Strategy

TDI works in countries all over the world and is committed to safe, tenable and environmentally friendly operations whilst endeavouring to minimise its impact on the environment where possible. Climatic concerns are evident in the countries in which TDI operates in, such as increasing temperatures, water stress and barren land. Faced with these



challenges, TDI continues to evaluate and make informed decisions to suit its operations as much as reasonably possible.

The company's environmental management approach is based on a commitment to Health, Safety and the Environment (HSE). TDI focuses on the reduction of consumption at the project and corporate level through the following initiatives:

› Regulated Power Supply

As part of its commitment to environmental sustainability, TDI strives to utilise solar power wherever feasibly possible. Installing solar generated power at a project level and not relying on the national grid has been challenging due to the constant need for regulated power to run operations. However, in an attempt to tackle this challenge, the development of hybrid solar power systems, which prioritise the use of solar and only use generators during peak loads, has created a viable alternative.

› Recycling Efforts

Waste generated at project and corporate level is managed with the least repercussions to the environment as much as possible. Recycling is encouraged throughout TDI with information on these efforts communicated regularly to employees. Recycling bins are clearly marked and placed in easily accessible locations.

At a project level, local companies and individuals recycle used oil and tyres. Under no circumstances are used tyres burnt during field operations. TDI ensures that emergency plans are in place should an accidental spill occur whilst handling oils during an oil change. All oil and tyre changes are conducted at each project's headquarters where access to available emergency services is readily available should it be required.

› Water

Water is often a scarce resource in the theatres in which TDI operates so all staff are instructed to use this resource carefully. All TDI camps take into account the siting of shower and ablution facilities as well as kitchen amenities. Areas that do produce run off water are to be situated away from the main living area and placed downstream.

Greywater is a beneficial resource, especially during times when the natural water supply is limited. Aside from the obvious benefits of conserving water and not relying completely on the use of boreholes, greywater systems afford TDI camps water for irrigation for the surrounding vegetable gardens.

› Climate Wise

TDI is committed to and focussed on environmental, social and

Climate Wise

Climate Wise is a global solution focused on providing investment for climate change as well as supporting local communities with education and lifestyle change initiatives.

Climate Wise supports a number of charities, intergovernmental organisations and non-profit organisations to address climate change, such as the Kenya Biogas Programme, Wind Energy production in India and the Clean Air Task Force (CATF).



corporate governance and has evaluated its head office costs. In conjunction with Climate Wise, TDI has offset the carbon footprint of every full time staff member at its headquarters to ensure that the head office is making positive changes to the overall health of the environment. The funds donated to Climate Wise are used to subsidise gold standard or UN certified projects. This forms part of the ongoing commitment by TDI to have all full time employees and their office locations offset by 31 December 2020.

3. Measurement of Outcomes

TDI has implemented the following measures to ensure sustainable business practices are followed as much as possible:

- › 1.5-kilowatt solar power system installed at TDI's headquarters;
- › Hybrid solar power system installed at the TDI project headquarters in Juba;
- › Recycling bins installed at the TDI headquarters;
- › Recycling bins installed at the project headquarters in Abyei;
- › Greywater systems implemented on the maintenance and IED projects in Mali;
- › A sustainable vegetable run by Cambodian Interpreters on the Civilian EOD IED project in Mali;
- › Solar geysers installed at the TDI headquarters, maintenance and IED projects in Mali and the RCC project in South Sudan;
- › Recycling oil and tyres on the projects in South Sudan, Democratic Republic of Congo, Central African Republic and Mali.



Section 4

Anti-Corruption



1. International Scope of the Mine Action Industry

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

TDI works in countries all over the world and the risk of fraud, bribery and corruption is always present. TDI ensures that there are mitigating measures in place to reduce these risks during operations. The company aims to uphold the highest standard of service in the industry whilst maintaining the trust and loyalty of its clients.

2. TDI's Commitment to Anti-Corruption and Ethical Business Practice

TDI's commitment to the principles of moral business is well established and the company is proud of its reputation as a business that adheres to the highest of ethical standards. All operations are conducted in compliance with the provisions of applicable anti-corruption legislation, most notably the Foreign Corrupt Practices Act in the United States, the United Kingdom's Bribery Act of 2010 and principle ten of the United Nations Global Compact. As a Constellis Inc. company, TDI is further bound by the anti-corruption policies of this group, which are extensive and govern every aspect of the business.

3. Implementation

As part of the company's commitment to ethical business practice, TDI has included its commitment statement to corruption free practices in its Staff Handbook and Code of Conduct, of which all staff are required to read prior to joining the company. In addition to this, the TDI contract of engagement outlines the company's commitment to corruption free business and that any attempt to make or solicit a bribe is an offence that will result in immediate dismissal.

Moreover, the company has an anonymous tip line to which any suspected fraudulent activity can be reported to an independent unit within the company that will immediately and robustly investigate any potential wrongdoing.

The company regularly carries out internal audits of its own processes to ensure compliance throughout and our finance department robustly scrutinise all transactions on a weekly basis. Spend limits ensure that no untoward payments over a nominal amount could be made. In addition to this, the company has submitted to an annual audit carried out by PricewaterhouseCoopers since its establishment.

TDI is confident that its team of personnel have the skill sets to complete all tasks without the need to engage in corrupt activities. TDI is proud of the record of accomplishment in incident free operations over the last fifteen years.





4. Measurement of Outcomes

Each individual under the TDI brand has a duty of care to uphold the organisation's ethics and report any incidents of bribery and corruption. It is the responsibility of every employee to report any wrongdoing so that the correct channels can be followed. The tally below highlights how the company monitors and evaluates its performances regarding anti-corruption:

- › No breach of policy has been recorded during this reporting period;
- › No reports of corruption have been reported to our head company, Constellis;
- › Senior management conduct internal checks and reviews every quarter to ensure that no unethical business practices take place that would breach TDI's policy on anti-corruption.