

An aerial photograph of a winding asphalt road that curves through a dense, lush green forest. Several cars are visible on the road, including a red car, a white car, and a blue car. The road has white dashed lines and a solid white line on the edge. The forest is thick with various shades of green trees.

Adam Smith
International

Adam Smith International:
UNGC Communication of
Progress – 2021

Communication of Progress

Communication of Progress	1
Support for the UN Global Compact	2
Introduction	3
Human Rights.....	4
Assessment.....	4
Implementation.....	4
Measurement of Outcomes	5
Labour	7
Assessment.....	7
Implementation.....	9
Measurement of Outcomes	9
Environment.....	10
Assessment.....	10
Implementation.....	10
Measurement of Outcomes	11
Anti-Corruption	12
Assessment.....	12
Implementation.....	13
Measurement of Outcomes	14

Support for the UN Global Compact

21 April 2021

To our stakeholders:

I am pleased to confirm that Adam Smith 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.

Our 2021 Communication on Progress describes our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations, as well as our achievements and areas for improvement in relation to embedding the UNGC principles.

Having become a certified B Corp in September 2019, ASI has remained committed to its triple bottom line that is closely aligned with these Ten Principles and the broader United Nations Sustainable Development Goals. 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 'Jalpa Patel', with a stylized, cursive script.

Jalpa Patel

Interim Chief Executive Officer

Introduction

Adam Smith International (“ASI”) is a global advisory company that works locally to transform lives by making economies stronger, societies more stable and governments more effective. The ASI group is headquartered in the UK and employs over 250 people worldwide. It partners with individuals and organisations to deliver its work across Central Africa, East Africa, West Africa, the Middle East, South and South East Asia, Latin America and the Pacific Islands. ASI is owned and operated by its employees. We are committed to corporate integrity and a triple bottom line of social, environmental and financial performance.



This way of working was formally recognised when we became a certified B Corp. B Corp certification indicates we balance profit and purpose through the highest standards of transparency and accountability as well as social and environmental performance. <https://bcorporation.net/>.

We believe we can achieve more in partnership with others than if we act alone. Our global operating model enables us to support our people and partners on the ground in delivering change in complex situations, in fragile states and where there is conflict. And by sharing our knowledge and experience, we can help to improve the standards of our industry, as well as the positive impact we can have on people's lives.

This is only possible if we think creatively about complex problems and deliver change through meaningful global and local partnerships.

We are governed by our **core values**, which shape our culture, underpin the way we behave and determine how we make decisions:



Partnership

Bringing together people from diverse backgrounds and adopting an inclusive approach to work.

This requires effective communication, sharing information and building relationships.



Resourcefulness

Working in complex, challenging situations and using resources wisely to achieve high quality outcomes.

We embrace responsibility, empower others and celebrate excellence.



Creativity

Finding new ways to create value through innovative thinking, technology and better ways of working.

We aspire to challenge the status quo, make problem solving personal and learn from others.

Our Code of Conduct continues to be at the core of all our stakeholder engagements, helping our employees, associates, suppliers and partners make decisions in often difficult and complex operating environments.

In this Communication of Progress (CoP) we have identified specific policies, actions and measurement systems we have implemented in the last year (2020/21) to work towards addressing the UN Global Compact's (UNGC) Ten Principles.

We welcome feedback and opportunities to discuss our work and the ways in which we can improve.

Human Rights

UNGC Principles:

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.

Assessment

Description of the relevance of specific human rights issues for the company (i.e., based on assessment of human rights risk). Description of policies, public commitments and company goals on Human Rights.

As a company delivering sustainable development, including in fragile states or where there is conflict, we strive to maintain the highest standards of integrity, professionalism and efficiency in carrying out our work. We set out these principles in our [Code of Conduct](#). We see it as our responsibility to support transparency, identify and address risks, regularly review our business practices, and collaborate with others to protect the rights of those who are most vulnerable to abuses such as modern slavery.

ASI is committed to preventing and reducing harm to children and vulnerable adults who may be in contact with our staff or associates. All ASI staff and associates are required to adhere to our Safeguarding Policy. ASI's Interim Chief Operating Officer acts as our global Safeguarding Lead, creating a trusted point of contact for staff, associates and any external stakeholders, to raise concerns and ensure that any safeguarding matters are investigated, disciplinary measures are taken where claims are substantiated, and processes are improved to prevent reoccurrence.

Beyond basic compliance with applicable employment and labour laws, ASI is committed to working with donors and partners to apply best practice through our supply chains and to use our expertise to help end human trafficking, modern slavery (sex trafficking and compelled labour) and all human rights abuses.

Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

Speaking Up and Investigations

ASI promotes a culture of openness, accountability, and high ethical standards. As part of our employees', suppliers' and partners' duty under the ASI Code of Conduct and Partner Code of Conduct, they must report suspected or actual violations of law and regulations, as well as ASI's policies in relation to fraud, bribery and corruption, counter terrorism, human trafficking, modern slavery and safeguarding. As outlined in our Speak Up policy, ASI employees and other stakeholders can raise concerns through multiple channels, including an independent Speak Up hotline.

Commitment to Preventing Modern Slavery in our Supply Chains

Our efforts in identifying and mitigating the risks of modern slavery and human trafficking have focused on prevention through our third party screening process and awareness-raising through training and policies, which clearly set out ASI's stance towards modern slavery and human trafficking. We understand that as we continue to gain a better understanding of our supply chains, we will expose further risks of modern slavery and we recognise that we will need to continually renew our efforts to minimise the negative impact on vulnerable people in our supply chain. We are therefore continuously reviewing potential processes to proactively identify and address modern slavery across our operations. Our ongoing commitment means that we will progress year on year in our efforts towards transparency, prevention, identification and mitigation of human trafficking and modern slavery deeper down our supply chains. ASI's Human Trafficking and Modern Slavery statements are available through our [website](#) and the Transparency In Supply Chains website.

Supply Chain Management

Our supply chains consist of third party suppliers, self-employed consultants and partner organisations spread across our global operational platforms.

We strive to ensure that all goods and services purchased as part of programme delivery and ongoing operations are free from modern slavery, human trafficking and other human rights abuses. ASI has a robust Third Party Screening process, which requires due diligence to be conducted on our partners and suppliers, including checking for any red flags or adverse media which could highlight human rights violations using ASI's Third Party Screening tool, which screens

over 200,000 international sanctions lists and media sources, including lists of companies and individuals linked to modern slavery and human trafficking.

As per our Third Party Screening Policy we continue to inform all our suppliers and partners of our commitment to human rights. Our partners and suppliers are required to certify their compliance with the ASI Partner Code of Conduct, which in turn requires our partners and suppliers to ensure that no human rights abuses, including modern slavery and human trafficking, are taking place within their own supply chains.

Construction Contracts

ASI considers any third party providing construction services directly to ASI or through one of our programmes as the highest risk third party in relation to potential human rights violations. This is because the supply chains involved in construction are complex and there is a higher risk of migrant labour being used for elements of construction. This demographic is less likely to be able to negotiate fair wages, e.g. they may be compelled to provide labour in exchange for food or accommodation. Therefore, apart from undergoing a robust due diligence process, as outlined above, every single contract involving some form of construction requires the approval of ASI's CEO or CFO.

Development Sector Networks and Forums

We are collaborating with organisations across the development sector on the topic of safeguarding and human trafficking. We are a member of the Cross-Sector Safeguarding Group (CSSG) which brings together representatives from NGOs, the private sector, the UN, research and financial institutions to collaborate and work on the area of safeguarding.

We also regularly attend the Safeguarding Lead network, a private sector led group borne out of the CSSG and the Human Trafficking Foundation, a network of anti-trafficking experts, NGOs and other organisations that work together to combat modern slavery by providing policy recommendations to HMG.

Onboarding of Staff and Associates

All our staff and associates are required to certify their compliance with the ASI Code of Conduct, through the Ethics and Compliance Declaration and are further bound to comply with the Code through the contractual terms of their employment or associate contracts.

Between April 2018 and August 2020, all corporate employees have been required to pass the following e-learning modules between once and three times as part of ASI's annual compliance training:

- Safeguarding Children
- Harassment and bullying at work
- Modern Slavery
- Equality and diversity in the workplace
- Unconscious bias
- UK Bribery Act

Measurement of Outcomes

Description of how the company monitors and evaluates performance.

Commitment	Key Performance Indicator
Staff safeguarding training	Our online Learning Management System records completion rates of the modules outlined above. We are committed to ensuring all employees complete our e-learning modules.
Number of Speak Up cases	ASI has an independently operated "Speak Up" hotline. We can report that no instances of human trafficking or modern slavery have ever been reported or found in our business or supply chains.

Human Rights Principles Case Study – The Khyber Pakhtunkhwa Education Sector Programme (KESP) (a UK government-funded education programme in northwest Pakistan)

Key SDGs addressed:



Summary

The Khyber Pakhtunkhwa Education Sector Programme (KESP), funded by the FCDO, focuses on improving access and quality of education for children in one of the most challenging regions in the world, the province of Khyber Pakhtunkhwa in the northwest of Pakistan. It does so by supporting the government to develop and execute a plan to improve education quality and access. Challenges are exacerbated by terrorism and insecurity in the region which has been a site of conflict for the last four decades. Conservative cultural norms and the diverse topography of the province make provision of education services particularly challenging. Against this backdrop, KESP has delivered exceptional results with more children coming to school, staying longer, and learning more. Reforms have improved teaching and learning processes, and governance and management in the public education sector. ASI has been implementing KESP since 2012.

ASI's Safeguarding Mitigation Measures

- ASI's safeguarding policy is applicable on all its programmes including KESP. The policy is articulated to all staff when inducted; where relevant, this is completed in the local language to ensure comprehension.
- ASI completes third party screening and background checks for all staff, consultants and suppliers on KESP prior to contracting them. This ensures that any past criminal convictions and safeguarding offences and disciplinary actions are highlighted.
- All staff on KESP are required to complete and sign an ethics and compliance declaration when contracted.
- All long-term staff on KESP receive an e-training on safeguarding, anti-bullying and harassment after joining.
- All KESP staff are told about ASI's whistleblowing hotline and SafeCall contact details to report safeguarding and other abuses to. Posters detailing this are placed in work locations in order to remind staff of this service.
- ASI delivered data sensitivity training to staff and consultants on KESP on encryption of data and the imperative to destroy data that is no longer needed. For example, when information relating to out-of-school children was no longer required, our team ensured that all such data was destroyed.



Labour

UNGC Principles

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.

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

Assessment

*Description of the relevance of labour rights for the company (i.e., labour rights-related risks and opportunities).
Description of written policies, public commitments and company goals on labour rights.*

ASI supports the UNGC principles on labour standards in addition to following local laws on employment and labour rights.

Equal Opportunity Employer

ASI recognises that everyone should be treated with dignity and respect in the workplace. ASI's Equality, Diversity and Dignity at Work Policy has the UK Equality Act 2010 at its core (as well as comparable legislation in the other jurisdictions in which we operate) and ensures that no employee or job applicant is discriminated against either directly or indirectly on the grounds of any of the protected characteristics – race, religion or belief, gender, marital or civil partnership status, sexual orientation, pregnancy and maternity, gender reassignment, age or disability – or is subject to bullying or victimisation. Concerns that these principles are not being respected can be pursued through our Grievance Policy.

Supply Chain Management

We must also ensure that any suppliers that provide goods or services to ASI and any other third parties we work with share our commitment to complying with labour laws and human rights. We conduct due diligence on sub-contractors and they are required to certify their compliance with ASI's Partner Code of Conduct, which includes a commitment to act in accordance with the UNGC Principles.

Identified Risk – Low Skilled Workers

We are aware that there is a higher risk of forced or compulsory labour or slavery amongst low skilled workers. Our global workforce includes a variety of lower skilled occupations such as drivers in the Democratic Republic of Congo and cleaners in Pakistan. We manage this risk by ensuring that all our workers receive a fair wage for the work they perform for ASI and by making all staff aware of the red flags to look out for in relation to modern slavery and human trafficking. Since our last statement we have also carried out significant work to promote our independent, multilingual Speak Up hotline and all our offices worldwide have posters raising awareness of this hotline which are visible to those in our workforce.

Duty of Care

ASI takes significant pride in the standard of its duty of care provision and is recognised in the industry for this. It absolutely recognises that it has a moral, contractual and legal duty of care for the health, safety and welfare of our employees and their families and associates in all our locations where we work, around the world.

This provision of duty of care, and the associated frameworks that underpin it, are necessarily central tenets of the business by virtue of the fact that many of our operations are in fragile post-conflict or developing countries with weak governance, weak rule of law and violent or hostile elements and environments. Resultantly, we expect very high standards and ensure that our operational platforms are shaped to reflect the duty of care needs and operating environment.

We are wholly committed to ensuring that staff are in healthy and safe conditions. As part of this effort we have dedicated personnel both in London and our major overseas offices who are responsible for implementing and managing the various duty of care frameworks that underpin our efforts and we consistently go above and beyond our contractual and legal obligations through the provision of enhanced service offerings such as the mandatory application of excellent personal accident and emergency policies, Trauma Risk Incident Management, HEFAT training, mental health and wellbeing services and counselling.

Our emergency response mechanisms and critical incident management skills are tried and tested and amongst the best in the industry, and, where necessary we have often supported staff and families in emergencies financially as part of our ongoing commitment to ensuring we meet this duty of care in every situation and where we cannot rely on the provisions of emergency or corporate insurances.

Professional Development

Supporting our people to learn, develop and progress within ASI is one of the three strategic priorities of our People Strategy. We provide opportunities for formal and informal learning. When staff join us, they receive an induction as well as being given access to our online platform which contains a range of both compulsory and optional training modules. Over the past year, we have built upon the leadership training offered to our senior leaders by offering periodic refresher training, and importantly by developing and rolling out People Management Training to all line managers in the business. We have continued to run periodic training on modules from our 'Impact Framework', which provides a range of learning materials for staff at all levels. We also have an individual learning and development fund through which any employee can apply for funding for individual learning activities to support their professional development. Priority is given to junior and mid-level staff and at least 50% of the fund must be allocated to women.

Prompt Payment Code

ASI seeks to treat its suppliers fairly and pay them swiftly so it is important to us that we are a signatory to the UK Government's Prompt Payment Code. Invoices are expected to be submitted by the second working day of the month following the period of work to qualify for our standard payment terms of 30 days. Late submissions can result in delayed payment terms of up to 60 days. In accordance with these terms, we paid 68% (68% in the previous period) of our suppliers within 30 days of supplying a valid and undisputed invoice in the most recent reporting period and a further 27% (29%) were paid within 31 to 60 days.

In mid-2020, ASI launched a new Microsoft Dynamics 365 ERP system which is now being used to dramatically improve the efficiency of ASI's entire finance systems including its invoicing cycles, with a self-service supplier portal to streamline the invoicing process. As part of our commitment to transparent performance, our payment performance KPIs will be shared with our supplier partners along with our commitment for continual improvement.

Mental Health

ASI has a Mental Health Policy and a network of Mental Health Champions aimed at supporting the mental health and well-being of all staff. We ensure that the Private Medical Insurance we offer to our employees includes mental health cover wherever possible (unfortunately, in a few countries we have not been able to identify a provider who offers this) and we have enhanced our offer to staff through an Employee Assistance Programme to staff, which now offers eight face-to-face counselling sessions, as well as providing online and telephone-based options for support.

Our network of Mental Health Champions is very active; this year establishing a SharePoint portal with content for all ASI workers and a monthly newsletter, with subjects including Burnout, Grief, Stress and working in the field during the COVID-19 pandemic. We are also running a series of workshops with teams across the business to explore mental health and wellbeing challenges and to discuss how we can better manage and support the mental health and wellbeing of ourselves and others.

Flexible Working

As a result of COVID-19, 2020 has been a year of extensive flexible working, both at home and in the field. Most of our people have worked remotely for extensive periods of the year and we have supported this process by providing contributions to broadband payments and increasing the availability of laptops to those employees who previously only had access to desk-top computers.

We currently have 20 staff on a range of formalised flexible working arrangements including part-time working and working from home on a regular basis. These staff are at all levels of the company, and many more staff benefit from flexibility on a more informal basis, such as through occasional or ad-hoc home working. We also offer staff the opportunity to take time off for study leave or to go on sabbatical.

Our job adverts promote flexible working, and our Flexible Working Policy makes clear that all staff are entitled to request a flexible working arrangement and we will endeavour to support such requests wherever possible.

Diversity and Inclusion

We pride ourselves on being a diverse and inclusive workplace. In 2020 we welcomed a second cohort into our Women Leaders Sponsorship Programme, which has the ambitious goal of reducing the gender imbalance in leadership roles and bridging the gender pay gap. The programme pairs exceptional women with senior staff sponsors (men and women) who have been asked to actively support the career advancement of the participant by advocating on their behalf, opening up professional networks, creating opportunities, providing coaching and advice and supporting the participant to develop the skills they need to advance.

We are immensely proud to have appointed a female Interim Chief Executive Officer and to have a 50-50% balance within our Executive Team.

At the policy level, diversity & inclusion analysis is integrated into our core HR processes, incorporating analysis of our performance and salary review process by gender and geographic location and ensuring that at least 50% of our new individual learning and development budget is allocated to women.

Implementation

Supply Chain Management

ASI's supply chain due diligence process, as set out above in the Human Rights section, strives to ensure that ASI only engages with third parties that adhere to the same stringent ethical standards in relation to labour law and human rights, as ASI. ASI's Partner Code of Conduct sets out our expectations in relation to ethical conduct expected of our partners, which includes compliance with the UNGC Principles, as well as an explicit prohibition of engaging in any form of forced, bonded and indentured labour, as well as child labour. The Partner Code of Conduct also references the ASI Speak Up hotline, which should be used to report breaches of the Partner Code. ASI requires its Partners to adhere to the principles that are set out in the Partner Code of Conduct and to cascade these standards further down their supply chains. The Partner Code of Conduct also provides ASI with audit rights to ensure that Partners are complying with the Code.

Onboarding of staff and associates

As part of the onboarding process, employees are required to pass the following e-learning modules related to the UNGC labour principles:

- Equality and diversity in the workplace
- Harassment and bullying at work
- Modern slavery

ASI Employee Owned Trust

Our company is owned by the trustees of the ASI Employee Owned Trust (EOT). The ASI EOT was specially formed for the purpose of holding the shares on behalf of the beneficiaries of the EOT i.e., the employees of ASI. Inherent in this form of business ownership model is the need for standards, competitiveness and dynamic thinking to flourish without the need for outside shareholders. It follows that those charged with managing the business must take responsibility for involving employees in relevant aspects of the running of the business. In May 2019, we launched a Staff Council to enhance the communication channels between employees, the Executive Team, the Directors and the Trustees.

ASI Staff Council

In May 2019, we launched the ASI Staff Council to give all those working for ASI a voice, enable senior management to consult more broadly with all employees and enable the workforce to hold the executive to account. The Staff Council currently has 6 members who were elected by their constituents. The composition represents a cross-section of ASI's workforce both by geographical region and by type of role with one member also representing the many hundreds of workers we engage, largely as contractors, on specific projects.

We also continue to promote our independent, multilingual Speak Up hotline and all our offices worldwide have posters raising awareness of this hotline which are visible to those in our workforce.

Measurement of Outcomes

Description of how the company monitors and evaluates performance.

Commitment	Key Performance Indicator
E-learning	Our online Learning Management System records completion rates of the modules outlined above. We are committed to ensuring all employees complete our e-learning modules.
Number of Speak Up cases	ASI has an independently operated "Speak Up" hotline. We can report that no instances of forced, compulsory or child labour have ever been reported or found in our business or supply chains.
Supply Chain Management	ASI can confirm that through our Third Party Screening process, ASI has not identified any third parties which have been found to have breached international labour or human rights laws.

Environment

Principles:

Principle 7: Businesses 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.



Assessment

*Description of the relevance of environmental protection for the company (i.e., environmental risks and opportunities).
Description of policies, public commitments and company goals on environmental protection.*

ASI is committed to minimising its environmental footprint by preventing pollution, reducing GHG emissions and encouraging practices to promote sustainability. This is part of our triple bottom line commitment to account for financial, social and environmental performance. We are working to measure, monitor and minimise our corporate environmental footprint, and to support improvements to the environment through our projects. We have adopted a strategic objective of being carbon neutral by 2025 and a net positive contributor to the environment by 2030.

We have an Environment Policy and Action Plan that define our objectives and methods and are currently preparing a detailed plan to reduce and offset corporate and project emissions year on year by 2025. Our Environmental Policy complies with the ISO14001 standard with a particular focus on UN SDG Principle 12: responsible consumption and production.

Implementation

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

Environment Policy

In February 2020, ASI's global network of Environment Champions developed a new Environment Policy underpinned by the company's "reduce, reuse, recycle, offset" environmental strategy and setting out the procedures to respond to an environmental incident. The new policy is applicable to all ASI employees and self-employed contractors worldwide and is publicly available on the company's website [here](#).

Environmental Strategy

ASI's environmental strategy is focussed on the reduction in consumption at both the corporate and the project level. However, we recognise that, as a business, certain types of consumption cannot be avoided. When consumption cannot be avoided, ASI expects its workers to recycle, reuse and offset.

We recognise that back-up diesel-fuelled power and flight travel are significant parts of our Scope 2 and 3 GHG emissions. With the investment the company has made in technology, and with the global roll out of Microsoft Teams for calls and chat and video conference facilities in 2019, we hope that this will help reduce the requirement for business travel. We also plan to limit the frequency and lengthen the duration of project-related missions.

However, ASI is aware that in the international development sector in which it operates, air travel cannot be completely avoided. We are therefore working in partnership with Climate Care <https://climatecare.org/> to help offset our flight emissions with gold standard carbon offsets. Whilst currently unable to offset all of our emissions, we are preparing a plan for progressively greater emissions reductions and offsets between now and 2025. Implementation has already begun with the carbon offset of the 2019 flight emissions of Board, Executive Team and Internal Audit team members when travelling for business purposes.

Environmental Assessments

ASI conducts yearly, systematic reviews of facilities and projects worldwide using an environmental assessment questionnaire. ASI's Environment Lead is currently working with external experts to analyse the data produced through these questionnaires in order to generate a report for the company that can further direct our work to improve our environmental performance.

Training and Awareness

ASI's global network of Environment Champions conduct education and learning sessions with its employees on environmental issues to increase awareness and stimulate positive behaviour change and also write and circulate a quarterly newsletter to all staff, the "ASI Green Times" to raise awareness of new company policies, company examples of best practice and updates on the bigger picture of environmental issues worldwide.

Measurement of Outcomes

Description of how the company monitors and evaluates environmental performance.

Commitment	Key Performance Indicator
Net zero by 2025	ISO 14001 accreditation, training on the Environmental Policy, environment KPIs in our corporate strategy, data from our Environmental Assessment Questionnaires, and measuring our flight usage.
Offsetting flights through partnership with Climate Care	142 tonnes offset with Climate Care for 2019
Annual environmental impact assessment	<p>ASI conducts a yearly environmental impact assessment of its operations. This includes an assessment on (where data is available):</p> <ul style="list-style-type: none">• Scope 1, 2 and 3 carbon emissions• Water consumption• The number of CFC appliances operated• Total carbon emissions• Waste, Energy, and gas consumption• Environmental Hazards• Procurement and Suppliers

Anti-Corruption

Principles:

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

Assessment

Description of the relevance of anti-corruption for the company (i.e., anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

International Development Sector Context

The compliance requirements in the international development sector are increasing, as are donor and client expectations. Public and media scrutiny have intensified, and the need to maintain the highest standards of corporate governance, as well as the trust of our beneficiaries, partners and donors has remained as critical as ever. Given the countries that we work in, we recognise that there is an increased risk of fraud, bribery and corruption, and we must therefore ensure that we dedicate sufficient resources to mitigating these risks.

ASI's Commitment to the Anti-Corruption Principle

ASI seeks to proactively protect the organisation, its clients, its partners and its beneficiaries from instances of fraud, bribery and corruption. This means that ASI:

- Will always seek to take disciplinary and/or legal action against those found to have perpetrated, been involved in, or assisted with fraudulent or other improper activities in any of its operations.
- Is committed to developing an ethical culture and reducing to the absolute minimum the likelihood of fraud, bribery and corruption occurring in any of its operations.
- Encourages immediate reporting of any actual or suspected incidents of fraud, bribery and corruption.

ASI has measures in place that reduce the likelihood of fraud, bribery or corruption occurring. These include risk management arrangements, documented financial procedures and a system of internal controls.

ASI is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, safeguarding all resources which have been entrusted to us, as well as implementing and enforcing effective systems to counter fraud, bribery and corruption.

ASI's Counter Fraud and Anti-Bribery and Corruption Policy

ASI's Counter Fraud and Anti-Bribery and Corruption ("CFAC") Policy governs ASI's approach to preventing, detecting and responding to instances of fraud, bribery and corruption.

ASI staff and associates are required to adhere to the following principles as per the CFAC Policy:

Principles and rules

- ✗ ASI staff and associates **must not** give or receive bribes and **must not** use intermediaries, such as agents, consultants or any other business partners to commit acts of bribery.
- ✓ Always notify the Legal, Ethics and Compliance team of situations where a bribe or other unethical payment has been solicited.
- ✓ Always ask yourself before offering, giving, or promising anything of value to any person if what you are considering could be viewed as having an illegitimate purpose. If the answer is yes, you must not proceed.
- ✓ If you have any doubts about how your actions may be perceived, please consult with a member of the Legal and Ethics team.
- ✓ Always keep a record of actions and decisions taken in relation to approval of payments and the use of third parties.
- ✗ Failure to act by ASI Workers when aware of an actual or suspected breach of this Policy may be subject to the disciplinary process, up to and including dismissal for gross misconduct.

Implementation

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

ASI Code of Conduct

[ASI's Code of Conduct](#) establishes the ethical expectations of all people who work for or on behalf of ASI. The ASI Partner Code of Conduct sets out the same expectations for ASI's Partners.

ASI's Counter Fraud and Anti-Bribery and Corruption Policy

ASI's Counter Fraud and Anti-Bribery and Corruption Policy sets out in detail ASI's approach to preventing, detecting and responding to incidents of fraud, bribery and corruption.

Speaking Up and Investigations

ASI promotes a culture of openness, accountability, and high ethical standards. As part of our employees', suppliers' and partners' duty under the ASI Code of Conduct and Partner Code of Conduct, they must report suspected or actual violations of law and regulations, as well as ASI's policies in relation to fraud, bribery and corruption, counter terrorism, human trafficking, modern slavery and safeguarding. ASI employees and other stakeholders can raise concerns through multiple channels, as outlined in our Speak Up policy, including an independent Speak Up hotline.

Upon receipt of a Speak Up report, ASI will conduct an investigation in an independent, fair, confidential and unbiased manner with respect to all parties involved and in accordance with the ASI Investigations Manual. Details of the report, the identity of the individual raising a concern, and anyone mentioned in the report are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.

ASI will take disciplinary action, up to and including dismissal (in accordance with local labour laws) against anyone who threatens or engages in retaliation or harassment of any person who has reported or is considering reporting a concern in good faith.

Training and Awareness

All ASI staff are required to take annual anti-bribery refresher training, as well as the anti-bribery and anti-corruption training they receive as part of their induction process. Counter fraud and anti-bribery and corruption topics form a part of face to face training sessions.

Onboarding of Staff and Associates

ASI conducts pre-employment background checks on staff and associates to ensure that they do not pose a fraud, safeguarding or other reputational risk. ASI staff and associates are required to certify their compliance with the ASI Code of Conduct by signing the ASI Ethics and Compliance Declaration and disclosing any conflicts of interest they may have.

Third Party Screening

ASI's global supply chains consist of third party suppliers, self-employed consultants and partner organisations spread across our global operational platforms.

ASI has a robust Third Party Screening process, which requires due diligence to be conducted on our partners and suppliers, using ASI's Third Party Screening tool, which screens over 200,000 international sanctions lists and media sources, including lists of politically exposed persons. In addition to undergoing the screening, ASI suppliers, subcontractors, grantees and other third parties are required to certify their compliance the ASI Partner Code of Conduct, which commits them to complying with ethical best practice, including the UNGC Principles.

ASI's Internal Audit Function

ASI's Internal Audit team acts as the third line of assurance to ensure that ASI's internal controls designed to prevent, detect and respond to incidents of fraud, bribery and corruption are operating effectively.

Anti-Corruption Programmes implemented by ASI

ASI builds the capacity of key state institutions within countries to increase the risk of engaging in corrupt activities by enhancing the ability to detect, investigate, prosecute, and adjudicate corruption. In addition, ASI works with civil society to enhance transparency, increase civic engagement, and hold governments to account. Through its international development programmes, ASI has delivered technical assistance focused on anti-corruption initiatives in countries such as Uganda, Ghana, Nigeria and Afghanistan.

Measurement of Outcomes

Description of how the company monitors and evaluates anti-corruption performance.

Commitment	Key Performance Indicator
E-learning	All eligible staff have completed the anti-bribery e-learning module.
ASI Ethics and Compliance Declaration	All new joiners are required to sign the Ethics and Compliance Declaration and declare any outside interests they may have.
Training and Awareness	Since ASI's last CoP, all eligible staff have received training on topics including Supplier Management, Contract Terms, Due diligence and Understanding Cyber Security. In addition, targeted training has been provided to 28 staff in respect of Third Party Screening and Ethics and Compliance.
Number of fraud, bribery or corruption reports received through different Speak Up channels	Since ASI's last CoP, 13 (17 previous year) fraud cases have been reported through the ASI Speak Up hotline and other reporting channels. 10 (13) cases have been investigated and closed and 3 (4) investigations are still ongoing.

Anti-Corruption Principle Case Study – STAAC (a UK government-funded anti-corruption programme in Ghana)

Key SDGs addressed:

Summary

After two decades of economic growth, Ghana has gone from relative poverty to become one of West Africa's wealthiest countries, but considerable development challenges remain.



Strengthening Action Against Corruption (STAAC), our flagship FCDO anti-corruption programme has been uniquely designed to provide technical assistance support to Ghanaian state organisations across the entire anti-corruption chain, from detection all the way to adjudication.

Operating within a highly complex and changing political environment, the ability to work in an adaptive and politically smart way - that goes beyond traditional political economy analysis has been at the core of STAAC's success. Examples of our work, and learnings therefrom, include:

Adaptive Mentoring in Financial Crime Investigations

- STAAC deployed a Mentor with a context-sensitive and flexible approach to understanding day-to-day practices and identifying opportunities for capacity building.
- As new challenges were identified, the Mentor broadened the engagement strategy from a purely tactical focus to working with senior supervisors on strategic organisational challenges.
- Through hands-on support to investigators, the Mentor was able to develop systems and collaboration processes for working with other financial intelligence and law enforcement agencies, in Ghana and in the UK, which shortly thereafter yielded life-saving gains for victims of romance-type fraud.
- This experience shows the value of combining bottom-up problem identification with top-down trust building, taking a realistic approach to changing organisational culture, and generating momentum for change from within.

Transforming Ghana's Financial Intelligence Centre

- Ghana's Financial Intelligence Centre (FIC) was established in 2008 to detect and analyse suspicious transactions that could constitute money laundering and other financial crimes.
- The FIC relied on manual processes to manage tens of thousands of reports and was unable to support law enforcement with intelligence products.
- STAAC partnered with the FIC in 2016 to design and implement a holistic organisational change approach, re-engineering the FIC's People, Processes, and Technology to deliver on its mandate.
- With this support, the FIC became one of West Africa's most efficient and effective financial intelligence units, overseeing the private sector, interfacing with other financial detection agencies, responding to law enforcement intelligence needs, and coordinating efforts to bring Ghana into compliance with FATF recommendations.
- This case demonstrates the value of trust-based partnerships that focus on problem identification and strategic accompaniment to deliver systemic and sustainable impact.

Strengthening People's Action Against Corruption (SPAAC) in Health Care Delivery in Northern Ghana

- Informal payments are a widespread corrupt practice in most public health facilities in northern Ghana, one that has denied basic healthcare to poor and vulnerable people.
- The SPAAC coalition sought to tackle petty corruption by increasing the responsiveness of national, regional and local health authorities and institutions.
- SPAAC followed a consensus-building approach to engage government stakeholders and build a broad based citizen constituency.
- The coalition conducted primary research across 24 healthcare facilities in the Northern, Upper West and Upper East regions to provide evidence on the incidence of corrupt practices.
- SPAAC-organised Healthcare Excellence and Integrity Awards gave health facilities an opportunity to reflect, shaming the worst performers, and demonstrating to authorities how integrity can be tracked and reinforced.
- Citizens in the northern regions became more vigilant and demanding, leading to increased monitoring of illicit payments by the National Health Insurance Authority.

In parallel, we worked with civil society, private sector and media to create enhance civic engagement and build pressure on the state government to address corruption issues.

As stated in the ICAI review *"DFID's Strengthening Actions Against Corruption (STAAC) programme embedded interventions in continuous political economy analysis, so that it could respond nimbly and seize opportunities for progress when and where these opened up."*

STAAC's design, alongside other DFID/FCDO Ghana programmes was considered to *"reflect global lessons on effective governance and institutional development work, including on working with political awareness, finding traction with units or individuals with a shared commitment to solving specific problems or better governance, and working adaptively by learning lessons on what works along the way. This approach is also recognized as more likely to bear fruit than top-down system-wide technocratic reforms."*

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