



Global Compact Communication on Progress

Control Risks

Annual Report 2021





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➤ CEO's Statement of Continued Support for the Global Compact

Control Risks is a longstanding supporter of the UN Global Compact and we apply its core principles in our own corporate practices as well as our advice to clients.

Throughout our 46-year history, we have sought to enable our clients to make well-informed decisions and to conduct business responsibly. From the beginning, Control Risks has sustained and grown our office network and operations in a wide variety of locations, embracing the cultural diversity that comes with our global footprint. Some of our work is in complex environments, including conflict and post-conflict zones and countries with weaker regulatory oversight. We are committed to operating responsibly and sensitively wherever we do business.

Human rights focus

In our report we've highlighted our risk and impact-led approach to human rights, which we regard as a cross-cutting issue that applies to all our activities and services, from crisis and security consulting through to human rights investigations. In light of our work in complex environments, our Code of Conduct and our Human Rights Policy have always been at the forefront of our activities. We apply The Voluntary Principles on Security and Human Rights (VPSHR) and (ICoC) International Code of Conduct for Private Security Providers guidance in our own operations and integrate them into our client solutions. Our other client-facing activities related to human rights ramped up over the year, including updating our solutions for Human Rights Due Diligence and

increasing coverage of these issues in our CORE online service.

Labour commitments

This past year especially, company boards and employees have prioritised issues related to labour. Commitment to People is one of Control Risks' four core values.

The COVID-19 pandemic has shone a light on how companies do or do not support their people. Last year our employee pulse surveys helped us to adapt our internal employment practices and to maintain our "One Firm" approach to building people networks and employees' social capital within the organisation. We also renewed our commitment to diversity, equity and inclusion, and I strongly endorse our new employee-led in-house support networks which

already receive a very high level of positive engagement throughout the organisation.

In compliance with the UK Modern Slavery Act 2015, we published our annual statement on the steps that we are taking to ensure that slavery and human trafficking do not take place in our business or supply chain. An important part of this is continuous training and promoting engagement with our policies for our employees, subcontractors and suppliers.

We continue to help our clients to implement locally appropriate and transparent labour practices including through our growing social compliance and labour welfare practice, and by putting people at the heart of our crisis management solutions.



Environment on the agenda

Questions concerning the environment and climate change have continued to climb up the corporate agenda, with many companies gearing up for the next UN Climate Change Conference (COP 26). This has heightened our awareness of the work that needs to be done regarding our environmental footprint and the ways in which we can advise our clients on these issues. Our Sustainability Committee has worked with the business this past year to identify three climate change corporate priorities for 2021-22: reducing workplace waste, measuring and shrinking greenhouse gas output, and promoting environmental sustainability in our employee and third-party relationships. Our clients' increasing appetite for environmentally sustainable and climate-change sensitive business has also prompted us to develop client-facing services on climate risk consulting.



Anti-corruption remains a priority

Anti-corruption continues to be a priority for us and for our clients. Control Risks is proud of upholding our own clear position against bribery and corruption while operating in the most challenging environments. We continue to actively engage with civil society organisations including Transparency International and UN Global Compact networks in Australia, Brazil and Germany as well as the UK. Last year, anti-corruption remained an important theme in our thought leadership and in our external publications and activities. Among this year's activities, together with the Americas Society / Council of the Americas (ASCOA), we published the third edition of the Latin America Capacity to Combat Corruption (CCC) Report, assessing Latin America's ability to detect, punish and prevent corruption.

The year ahead will undoubtedly bring new challenges, and we remain committed to continuous improvement of our performance against the Compact's ten principles.



Nick Allan
CEO, Control Risks



About Control Risks

Control Risks is a global specialist risk consultancy that helps to create secure, compliant and resilient organisations in an age of ever-changing risk. Our headquarters is in London, and we have a network of international offices in every region and almost every time zone. In this COP, we report on behalf of the entire Control Risks Group.

Control Risks exists to make its clients succeed - commercially and as corporate citizens. Working across disciplines, technologies and geographies, everything we do is based on our belief that taking calculated and informed risks is essential to our clients' success. We provide them with the insight to focus resources and ensure they are prepared to resolve the issues and crises that occur in any ambitious global organisation. We go beyond problem-solving, and give clients the insight and intelligence they need to realise opportunities and grow.

Control Risks and the Global Compact

Control Risks formally signed up to the UN Global Compact in September 2007, and is committed to embracing, supporting and implementing its ten principles. We believe that these are fully compatible with our own values and aspirations. At the same time, we are conscious that we can always go further in our pursuit of excellence. We therefore value our association with – and the opportunities to learn from – the UN Global Compact network of companies across the world. Working with our clients, we believe that we can make a substantial contribution to the promotion of good governance.

Structure of report

The structure of our COP reflects our understanding of the nature of our contribution to the UN Global Compact's objectives. The four main sections address the Compact's key themes: human rights, labour, the environment and anti-corruption. With one exception, each of these contains four sub-sections:

› **Our policy commitment presents a summary of our policies in these core areas.**

› **Plans for 2021-22 summarises our objectives for the year ahead.**

› **People and processes focuses on the practical implementation of these policies within our company, for example through training and internal procedures, and includes a summary of the latest developments.**

› **External engagement reviews our role in promoting higher standards through our work with clients, as well as participation in civil society initiatives and other forms of thought leadership.**



Human Rights

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

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

Our policy commitment

Control Risks' commitment to the UN Global Compact's principles on human rights is expressed in our [Code of Ethics](#), which states:

Control Risks respects the full range of human rights:

The company supports the Universal Declaration of Human Rights, and our employees are never to be complicit in human rights abuses. Control Risks is guided by the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights. It is a Signatory of the UN Global Compact.

We elaborate on this commitment in a further policy document, our Human Rights Policy. Both the Code of Ethics and the Human Rights Policy are available in the [corporate responsibility section](#) of our website.

Our Human Rights Policy makes specific reference to the Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights (VPSHR), the UN Global Compact networks, the Montreux Document, the International Code of Conduct for Private Security Providers (ICoC), the UN Guiding Principles on Business and Human Rights, and the UK Modern Slavery Act.

Where appropriate we develop country-level policy and guidance documents to reinforce the Group Human Rights policy with a focus on matters of particular local concern.

In accordance with our commitments under the UK Modern Slavery Act, we publish an annual statement summarising the steps that we have taken to ensure that slavery and human trafficking are not taking place either within our business or in our supply chains. Our annual statement is easily located in the footer of

www.controlrisks.com. Further details are included in the Labour section of this report.

People and processes

Human rights risk and impact assessment

Our Client and Project Risk Management Policy states that senior management must assess both ethical and operational risks before submitting a proposal for a new assignment. The policy states that “We will not take on an assignment that leads us to cause or contribute to human rights abuses”. Our In-House Guide to Human Rights Due Diligence and Human Rights Impact Assessments offers supplementary guidance based on the UN Guiding Principles on Business and Human Rights.

We maintain country-level risk registers as an established part of our broader risk management processes. Project-specific risk registers are mandatory for assignments where the pre-acceptance review process has identified significant risks, including human rights and other ethics-related risks. All project risk registers include a column summarising our assessment of the human rights risks to external stakeholders. Management teams use the registers as a tool to monitor and update our risk assessments.

For a small number of particularly complex or high-risk projects, we set up an additional risk committee that is responsible for reviewing risks – including potential human rights concerns – at regular intervals. It does so in association with – but independently of – the project management team. As of July 2021, special risk committees are in place for five such projects, and these meet at least quarterly.

Ethics Committee

The Ethics Committee’s tasks include considering and ruling on any proposed work that could pose an ethical or reputational risk to the company, as well as advising on ethical concerns that may arise in the course of an assignment, including with regard to human rights. The committee is chaired by our Government and International Relations Advisor, a senior retired diplomat. Its standing members include the CEO, the General Counsel and one other member appointed by the CEO.

In 2020 seven cases were referred formally to the Ethics Committee (compared with nine in 2019 and 12 in 2018). There was no particular trend in either the subject matter or the geographical spread of cases. Cases ranged from Central America, through Europe and Africa to the Middle East and Asia. This is representative of our global reach. Issues covered included the ethics of dealing with particular governments and individuals through to whether we were comfortable being passed to intelligence agencies.

Training

Our online human rights training course, which was designed by a Control Risks in-house team, takes the form of eight videos followed by a short test. The first four videos explain our commitment to the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights, and review the particular issues associated with security, human rights and labour. In accordance with the Client and Project Risk Management Policy, the fifth and sixth videos explain how our business teams should assess

potential human rights concerns when taking on new clients and projects. The final two videos emphasise the need for continuous risk assessment in the course of our assignments, and explain how and when to report problems.

The training is available to everyone to reinforce their knowledge. It is mandatory for all senior employees within internal corporate functions, as well as all members of the following teams: Crisis and Security Consulting; Compliance, Forensics and Intelligence; Global Risk Analysis; Response; and Cyber Security.

We provide tailored face-to-face training on human rights to our international employees in Iraq at the outset of their deployment, and issue regular reminders of our human rights commitments. We also provide face-to-face Arabic-language human rights training for our local employees in Iraq, and update this regularly. We incorporate “dilemma scenarios” into this face-to-face training: the objective is to encourage participants to discuss practical solutions in response to the larger and smaller challenges that they face in their day-to-day operations. Similarly, we provide human rights training for locally recruited employees in connection with major projects in other high-risk regions such as Mozambique.

We include human rights principles and practices as a core ingredient in the security, risk and resilience training that we provide for external clients. In addition to our regular training courses, recent assignments include English- and Arabic-language training for guard force supervisors in North Africa and a one-day simulated exercises training session for a major international medical charity.

Internal whistleblowing procedures

We encourage employees who wish to raise concerns to talk to their managers in the first instance. If they feel uncomfortable doing so, they may make a confidential report using our whistleblower hotline, which is managed by an independent external provider. We are keen to ensure that employees feel comfortable to use the hotline if necessary, and regularly publicise our Whistleblowing Policy to highlight the ways in which employees may do so anonymously.

Over the past two years there has been an increase in the number of people who have raised concerns through these different channels. In the financial year ending in March 2019 there were three whistleblowing reports, rising to four in 2020 and eight in 2021. In part, the increase may reflect the fact that whistleblowing procedures are becoming better known. In 2020-21 the personal stresses and business pressures arising from the COVID-19 pandemic may have been an additional factor.

Out of the total of 15 cases over three years, one took the form of a report to a manager. In six cases the message was conveyed via a Control Risks email message, and eight people used the external provider. Five cases related to alleged dishonest behaviour while ten were to do with human resources concerns. In almost all cases, the people raising concerns felt able to share their names rather than being anonymous, and we believe that this reflects a sense of trust in management's willingness to address concerns fairly.



Third party complaints and grievance procedures

Control Risks is committed to handling grievances from third parties in a transparent and fair manner. Third parties who wish to register a grievance or complaint are invited to send an email to:

ethicsenquiries@controlrisks.com.

In 2020-21 we revised our Third Party Grievance Policy, including clarifying employees' responsibilities if any reports are made to them personally rather than via the hotline. As part of this review, we made our grievance process more prominent on our external website; the link to our guidance on how to make a complaint has been moved to the footer of the home page. We undertake to acknowledge receipt of any concerns within five days and to appoint a member

of Control Risks' management team as a point of contact for any ongoing enquiries. Special procedures apply to Iraq where we have established a channel of communication in Arabic.

In the year under review, we received one external complaint via the international website and one in Iraq.

External engagement

Engagement with clients

We regard human rights as a cross-cutting issue that applies to all our main service lines. For example, our security consultants apply VPSHR and the ICoC guidance, as well as the lessons learned from our own experience, in the recommendations that we make to our clients. Recent examples include a VPSHR "gap analysis" on behalf of an international mining client in Colombia. Control Risks assessed an affiliated mine's adherence to the

VPSHR focusing on its relationship with community stakeholders and the security forces. We made a number of recommendations to ensure closer adherence to VPSHR best practice.

Human rights continues to be a key theme in our external consultancy on supply chains. This includes conflict minerals risk assessments, as well as assessments of exposure to modern slavery risks (see Labour section below). Recent examples include an analysis of US Customs and Border Protection (CBP) policy and practice in imposing Withhold Release Orders (WROs) on companies that import goods that are believed to be associated with forced labour. On a similar note, we provided a client with recommendations on best practice on avoiding involvement with "conflict minerals" derived from war-affected areas.



Promotion of professional standards in the international security industry

Control Risks continues to be a major supporter of the Geneva-based [International Code of Conduct Association](#) (ICoCA), whose purpose is to promote, govern and oversee implementation of the ICoC. One of ICoCA's recent initiatives has been a guidance document on [Human Rights Impact Assessment for Private Security Providers](#). Control Risks reviewed the draft and is quoted (anonymously) in the final publication. We also contributed to a [webinar](#) to launch the guidance. We emphasised the need for a holistic approach to human rights due diligence: private security companies need to work in close coordination with project owners both in initial human rights impact assessments and in long-term monitoring of risks. To the extent that

they do so, they can play a small but vital contribution in economic recovery of conflict-affected areas.

Control Risks is also a leading participant in the Security in [Complex Environments Group](#) (SCEG), a special interest group within the UK industry body Aerospace, Defence, Security and Space (ADS). SCEG represents private sector security and risk management companies that are committed to the development and implementation of international standards in their industry, including the protection of human rights. Key themes in recent SCEG discussions include responsible security management in response to the COVID-19 pandemic as well as major geopolitical developments such as the US military withdrawal from Afghanistan. Richard Wylde, Control Risks' Director for Government and Defence, has been Chairman of SCEG's Executive Committee since January 2020. SCEG will be marking its 10th anniversary in December 2021.

Thought leadership

We regularly publish reports on human rights on our online subscription services for clients. Topics covered in 2021 include analysis of the US State Department's annual report on human trafficking; new German legislation mandating human rights due diligence in supply chains; and emerging patterns in international sanctions enforcement in response to human rights concerns in countries such as Myanmar. In a May 2021 [podcast](#) with the Linklaters law firm, Control Risks consultants Maria Knapp and Clare Morton spoke of the need to integrate human rights due diligence into "business as usual". We also regularly comment on new developments in the field of modern slavery and labour welfare (See Labour section below).



Plans for 2021-22

➤ Continue to develop our risk assessment procedures in relation to the human rights impacts of our international office network, including with regard to labour rights and modern slavery risks.

➤ Review our guidance and develop training on Prevention of Sexual Exploitation and Abuse (PSEA), especially in complex and conflict-affected areas.

➤ Refresh our Human Rights e-learning course and release this as part of our ongoing programme of mandatory compliance training for employees.



Labour

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- Principle 3:** Business should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4:** the elimination of all forms of forced and compulsory labour
- Principle 5:** the effective abolition of child labour; and
- Principle 6:** the elimination of discrimination in respect of employment and occupation.
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Our policy commitment

Labour welfare and modern slavery

Our [Code of Ethics](#) states that:

Control Risks is committed to building a workplace and a society that give equal opportunities to all, regardless of a person's race, ethnicity, gender, gender identity and expression, sexual orientation or disability.

We recognise that policies demand actions and that there is more work to be done by us and society at large to tackle injustice and institutionalised barriers to advancement.

Our [Human Rights policy](#) further states that:

Control Risks has zero tolerance for modern slavery and human trafficking:

it is committed to implementing effective systems and controls to ensure that neither practice is occurring anywhere in its supply chains.

In compliance with the UK Modern Slavery Act 2015, Control Risks publishes an annual statement on the steps that we are taking to ensure that slavery and human trafficking do not take place in our business or supply chain. A link to the statement is published in the footer of: www.controlrisks.com accessible from all pages including the home page.

Commitment to people

Commitment to People is one of Control Risks' four core values. We are committed to providing opportunities for our people to develop, achieve their professional aspirations, and enjoy successful and rewarding careers within the company. This commitment is reflected in our human resources policies, systems and activities across our offices.

We respect the rights of our people to form and join trade unions for the protection of individual and collective interests.

Diversity, equity and inclusion are key elements of our company strategy. Control Risks aims to create an environment that welcomes and respects the different perspectives of all our people, as well as those of our clients and our suppliers. Control Risks' inclusive "One Firm" culture means that our people feel part of the company and valued.

We are committed to ensuring that our people are consulted about any changes to the business that will have an impact on their employment.

The following statements are extracts from our human resources policies:

Control Risks is committed to providing a professional and inclusive working environment in which all employees have accountability to treat everyone with respect and dignity. To achieve this all employees are expected to demonstrate behaviours in line with our core values and behavioural indicators: Integrity and Ethics; Collaboration and Teamwork; Commitment to People and Professionalism and Excellence.

- In accordance with our values and “One Firm” principle, the company aims to foster an inclusive culture, in which employees are able to realise their full potential and contribute to the success of the business.
- Control Risks’ approach to diversity, equity and inclusion is underpinned by our belief in the importance of treating each other fairly and with respect.
- Control Risks recognises that the best ideas come from a diverse pool of knowledge, and values the range of backgrounds and experiences that generate such ideas. We understand that open minds lead to mutual respect and ensure openness to change and innovation.
- Control Risks is committed to providing a working environment in which respect for people’s dignity is at the core of our organisation. The company and all its employees have accountability to ensure a working environment in which everyone is treated with respect and dignity.
- Control Risks’ employees have the right to work in an environment of mutual trust and respect, where everyone is fairly treated without discrimination. We emphasise the fact that any employee who has raised concerns about discrimination will not be victimised in any way.

Control Risks aims to ensure that individuals:

- **Receive equal treatment in all aspects of engagement with the company.**
- **Are not subjected to any form of discrimination or victimisation regardless of sex, race (including colour, nationality or ethnic origin), marriage or civil partnership status, pregnancy or maternity, gender reassignment, sexual orientation, age, religion or belief, and disability.**
- **Are not disadvantaged or treated less favourably by a condition or requirement that cannot be reasonably justified.**



People and processes

Modern slavery risks and our relationship with subcontractors and suppliers

We train our employees on labour and modern slavery risk as part of our internal human rights course that emphasises our commitment to international labour standards. It is important that our employees can recognise any potential problems in relation to the vendors that they interact with; we encourage our employees to remain alert and to escalate any concerns.

As a risk consulting company, we employ trained professionals with specific skillsets and qualifications, meaning the issue of forced or child labour does not arise in our own operations. By extension, we believe that the likelihood of exposure to such practices in connection with our relationship with suppliers and subcontractors is minimal, and our internal procedures are designed to ensure that this remains the case.

We expect our vendors to abide by our Code of Ethics, Human Rights Policy, and Anti-Bribery and Anti-Corruption Policy when working on the company's behalf, including our principles on labour practices, diversity, equity and inclusion. Vendor management is governed by our subcontractor and supplier policies which apply globally.

Drawing on our internal risk review of potential exposure to labour rights, we have placed a particular focus on our relationship with suppliers of personnel for tasks such as cleaning or driving services, noting that in many jurisdictions such services are provided by migrant workers who may be more vulnerable to exploitation. During the vetting stage, we look closely at each agency's recruitment and employment practices,

for example with regard to the payment of overtime and the availability of grievance mechanisms. This year we organised a series of internal meetings to raise awareness of those vetting tools and give employees an opportunity to ask questions and provide feedback on the process.

Promoting engagement with our policies

As noted above, labour risk is a feature of our ongoing cycle of compliance training. To bring our policies alive, in November 2020 we made worker welfare and our human rights policy the focus of a dilemma circulated to all parts of our business. The scenario was a client construction project involving migrant workers in which Control Risks was advising on possible responses to the COVID-19 pandemic. Our colleagues were asked to vote on the options, considering the impact on workers. This initiative was well-received and encouraged colleagues to see our policies in the context of a practical example.

Internal employment practices

Of the four labour principles in the Global Compact, Principle 6 on non-discrimination applies most directly to Control Risks' operations. This emphasis is reflected in our systems and activities. We have systems in place to ensure that any issues relating to, for example, discrimination, bullying or harassment are dealt with fairly and objectively. These systems are set out in our Grievance and Behaviours and Dignity at Work policies and processes.



Activities

Responding to the COVID-19 pandemic

In 2020-21, as part of our duty of care we have continued to place particular focus on ensuring the wellbeing of our employees across each phase of the pandemic. This has included:

- ▶ Conducting two pulse surveys to access how employees are feeling about a range of factors, such as leadership through the pandemic, communication, personal mental wellbeing, productivity and collaboration. The feedback received has informed our approach to mental wellbeing support and has been a valuable input into our plans for future working practices.
- ▶ Providing mental health awareness training by external experts to the HR Team to enable them to better support both managers and employees.
- ▶ Ensuring regular communication between the company and employees to remove uncertainty and signpost support through leadership videos, podcasts, intranet articles and one-to one manager check-ins.
- ▶ Continuing to operate global principles for dependency leave, sickness absence and pay to remove uncertainty and to ensure a minimum level of cover was in place for all employees.
- ▶ Providing physical and mental wellbeing guidance for employees and managers, including mental health in the workplace eLearning, a dedicated guide for managers and a range of activities such as podcasts, webinars and virtual yoga classes to support employees to cope with the challenges the pandemic has created.
- ▶ Adherence to our established health and safety protocols when transitioning back to working in offices.
- ▶ Continuing to minimise travel during the COVID-19 pandemic, taking full account of the evolving health situation at the local level in the countries concerned.
- ▶ Continuing to adopt flexible working practices. As a company we provide flexibility regarding remote working and flexible hours to our employees to support both individual circumstances balanced with the requirement to respond to client and business needs. During the pandemic we have continued to offer and support this flexibility and have ensured that we are compliant with government guidance/legislation on remote working/working from home where required.
- ▶ Launching Mental Health Champions with a pilot in our EMEA region. Mental Health Champions are employees who have received mental health awareness training and provide an additional layer of support to employees who wish to have a confidential conversation. Mental Health Champions are also able to signpost further support that is available and will play an active role in raising awareness of mental health in the workplace.



Refocusing our commitment to diversity, equity and inclusion

In 2020 we launched refreshed diversity, equity and inclusion aims (shown below) and outlined the steps we plan to take to achieve these:

➤ **To be a meritocracy where all our people feel included and know that they can succeed based on their talent, behaviour, work ethic and commitment to the firm and our clients.**

➤ **To ensure that the make-up of our firm is representative of the societies where we are based and our global footprint. We aim to be a business that actively challenges institutionalised barriers to advancement.**

➤ **To increase the proportion of senior leaders in the firm from under-represented groups; we will ensure that bias has no place in our recruitment, attraction and promotion processes.**

➤ **We will work to create an environment where all our people feel included and are able to bring their whole selves to work.**

As part of the communicated plan, in 2020-21 we have:

➤ Launched a new diversity, equity and inclusion eLearning programme that all employees are expected to complete. The programme aims to build a foundation level of knowledge, set expectations of the behaviour expected of everyone in creating a supportive and inclusive work environment and provide guidance on how to do this in daily interactions. This is also built into our induction programme.

➤ Started a project to identify how we collect further diversity data, such as on ethnicity and disability, across our office locations to improve how we monitor and track progress.

➤ Provided Inclusive Leadership training to the Executive Committee.

➤ Moved to the final stage of a project to implement a talent acquisition system globally through which all recruitment applications are managed. The system will enable improvements to our recruitment process, allowing us to reach broader and more diverse candidate pools, remove bias from our screening processes and report on the diversity of candidates at each stage of the process.



In our 2019-20 report we referenced the launch of two employee-led in-house people networks: Mosaic, which is for LGBT+ employees, and the Women's Network. In 2020-21, a further people network, Synergy, was launched in the UK to promote and celebrate ethnic diversity at Control Risks. Synergy has

already run a range of educational events and is a member of our Global Diversity, Equity and Inclusion Forum which meets each quarter with the Company's leadership to inform and shape plans to meet our aims. Regional diversity, equity and inclusion committees, made up of employees,

are now established in all three of the company's regions. All our diversity, equity and inclusion groups feed in ideas and perspectives, support the implementation of global projects and work to raise awareness.

Focusing on the development of our people

As part of this activity, we have:

- ▶ Provided additional resources to help our people adapt to remote working in response to COVID-19
- ▶ Deployed a series of modules regarding “Prospecting” to help our people maintain connection to clients
- ▶ Completed the implementation of an absence management system, which manages the request and sign off process for annual leave. This allows for global reporting of leave by employees, supporting managers in driving a wellness agenda, particularly relevant in the lockdown situation of COVID-19.
- ▶ Developed, and piloted in EMEA, a new Account Management course to support our broader business development strategy
- ▶ Agreed the scope of a new Partner Development Programme, selected appropriate external partners to deliver the programme and commenced the rollout
- ▶ Continued to invest in compliance and technical skills training
- ▶ Sustained focus on our new manager programme as an important component of our management and leadership curriculum
- ▶ Refreshed our performance management strategy with an increased focus on Partner Performance Management, strengthening the connection to our vision



Developing a career framework

We have continued to develop a more comprehensive career framework that provides:

- ▶ Greater clarity and understanding around career progression and expectations for employees at each level in the organisation.
- ▶ A basis for consistency in recognising levels of experience and how individual performance is measured and rewarded.
- ▶ Support and guidance for business managers to help with career discussions and career development.
- ▶ A way of ensuring that we are attracting and retaining the right skills and diversity of workforce for the future.

We have also redesigned our methodology for building pay scales and agreed an implementation plan with our Executive Committee. Pay scales will provide greater structure and transparency to compensation management.

External engagement

Engagement with our clients – supply chain risk management

Our most important external engagement is with our clients. Since last year we have continued to develop our services and experience in helping our clients to manage social and human capital risks in their supply chains across the world. Our work in this area has become a key pillar of our broader ESG services for clients and includes:



Risk assessment

We help clients to map the key risks in their value chains, including those impacting labour rights, modern slavery and child labour, to identify the projects, activities and drivers that could most expose their operations and stakeholders to risks.



Building controls

We work with clients to review their existing controls, benchmarking them against international best practice and suggesting enhancements where needed.



Capacity building and support

We provide embedded teams and training to internal and external stakeholders to ensure that controls are implemented effectively.



Monitoring and reporting

We monitor compliance with international best practice and responsible sourcing standards, using first-hand resources in our clients' countries of operation. This includes site assessments to independently evaluate the effectiveness of controls and, where necessary, to identify potential grievances before they escalate.



Problem-solving

We offer a combination of crisis-management and investigations skills, including on-site visits, document analysis and stakeholder interviews to identify control failures and recommend mitigation strategies.



Stakeholder mapping and engagement

We work with companies to help them to introduce best practices in labour rights into their supply chains and sectors.

Recent highlights include:

A responsible sourcing and supply chain assessment in the Middle East for a leading international online retailer. We mapped the risks across Gulf state countries and sampled 50 suppliers to identify areas of exposure.

Expanding our embedded team of consultants to monitor the labour rights and working conditions for Expo 2020 Dubai against industry-leading welfare requirements. This included onboarding contractors, monitoring employment practices, reviewing accommodation and training suppliers across the country.

Acting as the audit quality partner for Sedex's international audit quality programme. Our teams in Asia, Europe and Latin America are reviewing the performance of the auditors who deliver

Sedex's SMETA responsible sourcing and supply chain audits to its members.

An end-to-end recruitment supply chain review for an international soft services company for their African and South East Asian migrant workers. Our work includes a living wage study, interviews with workers and recruiters, and a full review of employment practices to identify opportunities to align with international best practices.

Mapping the global footprint and exposure of a major, international maritime company, providing country-level risk assessments of more than 48 countries of operation and reviewing the client's human rights management system to determine responsibilities and activities for managing risk exposure. This included developing internal human rights training for all employees across the group.

Capacity building support to more than 250 suppliers of clients in the FMCG sector on responsible employment practices. This included developing training materials that incorporated international best practices and designing an impact measurement methodology for translating the training into action.

Due diligence on labour law and human rights compliance for an international technology company across Qatar, Lebanon, Dubai, Kenya and Nigeria.

We continue to publish a regularly updated global and regional monitoring report, which analyses and summarises the latest developments in the COVID-19 pandemic. We provide these reports free of charge to some 30 non-governmental organisations (NGOs).



Engagement with our clients – supporting diversity

This year we are providing risk advisory services on a pro bono basis to the Gay Games Hong Kong (GGHK), under licence from the Federation of Gay Games (FGC). This will be the first Gay Games to be held in Asia. Under the theme of “Unity In Diversity”,

the Games aim to promote unity and inclusion to help Hong Kong truly live up to its potential as a world-class city. The Games are about bringing people together through sports, arts and culture, open to all and everyone.

This year we have seen more enquiries from clients on how they can support their diverse employee populations

when travelling. We have proposed country risk profiling solutions that draw upon the personal experience of our MOSAIC and Synergy people networks, as well our international offices and global research capability, and have received very positive feedback.

Thought leadership

We report on key international developments in the field of social compliance, responsible sourcing, labour welfare, and modern slavery in our CORE online subscription service.

This year we have run several podcasts on the topics of responsible sourcing and social compliance in supply chains, including promoting the benefits of capacity building, risk-based audits and effective remedy approaches. James

Lewry, Director of our EMEA social compliance practice, has contributed to a number of webinars on labour rights issues, including in July 2021 as a panelist discussing Germany's new human rights due diligence law.

We continue to support working groups and contribute to policy development in the area of labour rights and human rights. Karim Daoud, a senior consultant and human rights expert in our social compliance practice in Dubai, is a member of the ILO Regional Office for

Arab States' (ROAS) Migration Advisory Group (MAG). MAG acts as a think tank and advisory forum to ILO ROAS on labour issues and its purpose is to provide ILO ROAS with strategic advice on labour issues in the Arab States region. This includes providing advice on key policy messages and their articulation, advising on smart entry points and on how to affect meaningful impact to policy change, and suggesting research strategies in various labour areas.

Plans for 2021-22

› Continue to develop our internal approach to modern slavery risk assessment.

› Continue our focus on supporting the development of our people.

Examples include:

› Completing the delivery of the new Partner Development Programme, focusing on Leading Change, Building Performing Teams, and Having Engaging Conversations.

› Launch the career framework which, will be complemented by a career path and promotion guide and a learning and development planning framework to support individual career development. Pay scales will be embedded in line with this framework.

› Continue to focus on supporting employees through the COVID-19 pandemic, completing the rollout of Mental Health Champions globally and providing further guidance and resources for managers and employees.

› Continue with our diversity, equity and inclusion agenda, specifically running inclusive leadership training for all our senior leaders and building on the diversity data we currently collect to enable us to better monitor progress.

› Adopt a hybrid approach to working. We want to ensure that we take the best of what we have learnt over the period of the pandemic and include this in our future approach to working practices. In considering the way we work going forward we have balanced the value of in-person time together, in the office and with clients; inclusivity and wellbeing; flexibility; and the trust and empowerment our people need to thrive. To support this, we are setting out a deliberate approach to our working practices going forward that is supportive of a hybrid approach to remote working to ensure a continued focus on staying connected and informed, while balancing individual needs.



Environment

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- Principle 7:** Business 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.
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Our policy commitment

Air travel

We recognise that, as an international firm with a global client list, our business activities have global environmental impacts. We care about making a positive impact on the environment and society and we know that this matters to our clients and people as well. One of the most significant ways we can respond to the climate crisis is by reducing our use of air travel. In our 2019-20 report we committed to preserving some of the environmental gains we had made during the COVID-19 pandemic by taking a hard look at how to cut back on air travel and change our people's expectation of flying.

The nature of our work means that business travel is often necessary, as our ability to support our clients sometimes requires us to visit their locations. Travel is also important for developing relationships. But we can and should challenge ourselves on the need and frequency of travel and how to travel responsibly.

The big change we have introduced, as part of our new Travel Purchasing Policy, is to require that the default form of travel should be by land rather than by flying, if the journey can be completed within five hours and travelling by land is safe.

We recognise that in order for this policy commitment to succeed, the company must support and encourage employees to choose more sustainable travel options. This includes making allowances for our people to travel by land, such as letting them leave work earlier to catch a train, or stay an extra night in a hotel. Both these options result in a much lower carbon footprint than flying, especially if the hotel follows good sustainability practices.

Other

Our policies are reviewed and updated in approximate two-year cycles, in order that we embrace the concept of continual improvement.

Our Code of Ethics includes a clear statement that we will conduct business in a manner that provides

for the protection of the environment. We say that we will, as practicable, continue to reduce the environmental impact of our operations and support the transition to a low carbon economy by using resources as efficiently as possible and by educating and motivating our colleagues to be environmentally responsible.

Control Risks' commitment to the environment is also outlined in the environmental aspects of our Health, Safety and Environmental Policy. The policy makes a commitment to "safeguarding the health, safety, security and overall well-being of our people, our clients and the communities who may be affected by our global operations". It adds that:

Emphasis must also be placed on protecting the environment and acting in a socially responsible manner, in compliance with applicable HSE laws and regulations to ensure our activities have a positive impact on our neighbours and society.

Further statements in the policy include:

- ▶ Control Risks will comply with all applicable environmental laws and standards in each location where it operates.
- ▶ Control Risks has identified three key areas of environmental focus, and is committed to monitoring, evaluating and reviewing its performance in these areas across all operating locations.

Our three areas of focus based on environmental concerns that are most pertinent to what the company does are:

▶ **Reducing workplace waste** by cutting consumption and increasing recycling of office materials.

▶ **Shrinking greenhouse gas output** by increasing energy efficiency and reducing the carbon intensity of our operations.

▶ **Promoting environmental sustainability** in our employee, supplier, leasing and contractor relationships. In this context, Control Risks will brief its employees and suppliers on its environmental commitments. We also consider environmental impact a significant risk factor in our risk consulting methodology. Working with other specialists where necessary, we give our clients the best possible advice that is consistent with their and our environmental responsibilities.

Reinforcing our policy Commitments

Over the last year we have launched a new sustainability page on our intranet to keep our people informed about the steps we have taken towards meeting our policy objectives and to let them know how they can play a part in environmental initiatives at Control Risks. The site offers employees interactivity, allowing them to share stories of their contribution as individuals to reducing environmental impacts and how they are helping clients to address climate change. They can also contribute ideas for further sustainability work. We want our people to feel pride that Control Risks is making a positive contribution to the environment and to give them the reassurance that we are thinking about the future and supporting clients to do the same.

People and processes

In June 2021 we were excited to welcome Muriel Dube to the Control Risks' Board as a non-executive director. Muriel brings an expertise in sustainability and in particular environmental issues and advises other boards on their sustainability strategies. Her credentials have a strong academic foundation: she holds a Masters in Environmental Change and Management from Oxford University, as well as executive development qualifications in Finance and Climate Change from Oxford University and Harvard University, respectively. Muriel will support the company in accelerating its sustainability agenda and her appointment demonstrates our corporate commitment to the environment at the highest levels.

Below the board level, we have a newly invigorated Sustainability Committee that now consists of a core team

representing all our regions, business units and functions. The committee helps to coordinate activities and companywide initiatives and engages leadership and environmental representatives across the world to get their support with integrating strategies and their involvement in projects.

A member of our Executive Committee sponsors and champions environmental management within the company and chairs the Sustainability Committee. She reports to the Executive Committee on the company's progress in our three areas of focus to confirm that these continue to reflect the company's goals.

Control Risks' Charity and Volunteering Policy allows our people to spend two days a year, in addition to their holiday allowance, engaging in a voluntary activity, project or charity, several of which are environmental initiatives.

Our Health, Safety and Environmental Policy is included in our global induction programmes for people joining the company. Compliance with applicable environmental legal and regulatory requirements is included in our internal audit process.

This year, several employees undertook the Global Reporting Initiative (GRI)'s

professional certification programme. GRI is one of the leading sustainability standards organisations and completing their training programme means that our consultants are better placed to advise clients on managing and communicating their risk and impact in areas including climate change and human rights. Control

Risks also licenses and applies the Sustainability Accounting Standards Board (SASB) Materiality Map® General Issue Categories in our work;

SASB is another leading ESG reporting framework, and we integrate its advice and metrics when working with clients looking to measure and monitor the ESG risks facing their business.



External engagement

Our work with clients

Our positive indirect environmental impacts relate to the services that we provide that can help our clients anticipate and respond to future environmental challenges.

Control Risks has built its professional reputation on providing the best crisis and incident readiness, response and recovery services to clients around the world. We help ensure our clients have the plans, people, and training to manage crises including environmental events such as severe weather, water or resource shortages or from the introduction of invasive species and viruses. We work closely with industry stakeholders to identify the environmental, market and man-made threats that can impact their industries

and help ensure they are prepared for, and able to respond to unexpected events. Our consulting services and crisis management expertise are used to help industries become more resilient by helping enhance crisis management plans and protocols.

In many of our situation-based exercises and workshops we will include total or partial environmental elements. We rehearse our clients' decision-making, recording and accountability against the backdrop of environmental crises originating from internal or external sources. Examples of these include fires within recycling centres or industrial plants causing the release of dangerous chemicals; oil spills and accidents on land and at sea; and natural incidents, including earthquakes and tsunamis, that have an impact on communities around our

clients' physical locations and those within their supply and customer chains.

For example, in the last 12 months Control Risks has worked with Australian horticultural industries and their stakeholders to help identify future risks to the sector that may be brought on by changes in market or environmental conditions.

We have also undertaken threat assessments covering climate and weather-related threats including one project that involved partnering with the Met Office to assess the risks and impact on an international sporting event.

Our North America practice has built up a speciality in responding to extreme weather events as part of our wider crisis management expertise. The 2020

wildfire season in the western US saw an unprecedented increase in the scale and destructiveness of fire activity across the states of California, Oregon and Washington. This, combined with the emerging “remote work” posture our clients had to adopt in the face of COVID-19, resulted in a dynamic where our clients were confronting rapidly intensifying risks to life and property while simultaneously re-defining the duty of care they owed their employees in a time of need. Our embedded Global Security Operations Centers teams sat at the intersection of this process, ensuring our client decisionmakers had up to date information on the impact to their operations and were in a position to make crucial decisions about support to employees impacted by these events.

Such support is not confined to North America. For example, we assisted a client in the Democratic Republic of Congo during the Nyiragongo volcanic eruption in May 2021 where our support included advisories on the evolution of events and evacuation planning.

Our ESG consulting services also help clients to mitigate environmental risks

by developing due diligence frameworks, methodology and questionnaires to evaluate ESG performance and strengthen risk management processes. One project for an international bank included the evaluation of environmental issues facing the US energy sector, such as methane emissions and wastewater disposal. We helped another client, a large mining company, to carry out a survey of water use policies, standards, and reporting requirements in the mining sector, to help benchmark it’s sustainability reporting against “good practices” for the industry.

Thought leadership

Control Risks in May 2021 facilitated and contributed to a joint event on sustainability issues by the Global Compact Network Germany and the Risk Management Association (RMA). Control Risks Germany is a long-standing member of the German Global Compact Network. On this occasion, we leveraged our relationship with the RMA to arrange an information event on sustainability trends and how companies manage environmental, social and governance challenges in their daily operations and along their

supply chains. Representatives of two well-known Germany-headquartered companies shared their practical experience. Control Risks contributed to the event by making the case for companies to actively prioritise sustainability issues and foster close internal alignment and collaboration across business units to ensure constant adaptation to international best practices and evolving regulatory requirements, particularly on climate change mitigation and worker welfare.

Helping local communities

In September 2020, a group of volunteers from the London office joined Bankside Open Spaces Trust to improve an urban community garden. Weeding, mulching, pruning, planting and pond maintenance all went hand-in-hand to maintain a valuable ecosystem. At this time during the pandemic, the Red Cross Garden near Borough, London, was not just a haven for wildlife and pollinators in the heart of the city, it was a lifeline for the local community living under government social restrictions, allowing them to enjoy outdoor spaces and improve their mental health.



Control Risks' Nigeria-based team embarked on a beach clean-up in July 2021. The 23-strong team of volunteers cleaned the 2km stretch of beach from Ogogoro to Atlas Cove in the heart of Lagos Harbour, removing dozens of bags of plastic waste and rubbish that had washed up along the high tide line. The rubbish was sorted, bagged and then sent to a local recycling centre.

In addition to the beach cleaning the team are running a series of awareness raising sessions around the impact of plastic on the fragile marine ecosystems. Lagos is a city of in excess of 20m inhabitants, the majority of whom live below the poverty line, and millions rely upon the marine environment for their day-to-day sustenance and livelihoods. There is significant work to be done: each day huge quantities of rubbish are discarded directly into the urban waterways, including by the refuse collection agencies. Raising awareness of the damage this causes is a crucial step in changing behaviours and adopting more sustainable practices.

Control Risks' Nairobi-based team also undertook a plastic clean-up exercise in July, where they picked up and recycled the plastics in an under-privileged local community located near to the office, as part of their commitment to conserve the environment and raise awareness both internally and in the community.

Internal engagement

Shrinking our greenhouse gas ("GHG") output

On the basis of "what gets measured gets managed", Control Risks has calculated certain types of carbon emissions created in its activities and in its wider value chain, for a number of years. But recently we engaged ERM, one of the leading providers of climate change advisory services, to establish our GHG emissions inventory across our 36 offices and global operations. In line with internationally accepted methodologies, the GHG inventory will be based on the WBCSD/WRI Greenhouse Gas Protocol corporate

accounting and reporting standard, which allocates emissions according to scopes 1, 2 and 3. The results will help us to identify ways we can do things differently to manage our carbon risks and opportunities. The Sustainability Committee will then make recommendations to the Executive Committee for next steps to reduce our carbon footprint over time, and progression to full reporting of scopes 1, 2 and 3 emissions.

There has been a significant reduction in air travel over the last year, which was mostly due to the pandemic when non-essential travel was not permitted. For example, using travel expenditure data, we estimate that the amount of non-recoverable/internal air travel undertaken by the company globally dropped by 89% over the 12 months to 30 June 2021. While some air travel has resumed with the lifting of restrictions, the "essential travel only" approach remains in place so the vast majority of travel is still for client



projects only. At such time when this approach is reviewed, we will remain committed to cutting unnecessary travel and using video meetings instead. Where there is a need for travel we will encourage our employees to choose greener ways in which to do so.

Other internal activities

This year we asked all of our offices to take part in Plastic Free July. This campaign aims to cut the amount of single-use plastic in our lives. Small changes from individuals can have a big impact, whether that's cutting the amount of takeaway drinks cups you use, or saying no thanks to plastic bags from shops.

Across our global network, offices and individuals have embraced the mantra to refuse, reduce, re-use and recycle plastic, and many will continue these changes beyond Plastic Free July. Some examples of our activity are that our Baghdad office has started using

a water cooler rather than individual bottles of water and installed a water filtration system to cut out the carbon footprint of transporting water to the office. Bogota has also replaced its plastic water bottles with refillable glass, and is reusing the plastic bottles as plant pots. It has replaced plastic crockery and cutlery with items made from sugarcane, cornstarch, bamboo and cardboard.

Our Dakar and Nairobi offices have increased the recycling provision in their office to include waste streams such as plastic, paper and cardboard, and have promoted the use of the recycling facilities through signage. Both offices have also started utilising local schemes to return used plastic ink and toner cartridges to the manufacturers for recycling.

Offices in Germany have replaced individually wrapped snack bars with large glass jars filled with dried fruit and nuts, and will now get their oat milk in

glass bottles. They have also made the move to plastic-free, refillable and environmentally friendly cleaning materials. London has made a similar move to glass bottles for milk, and now stocks eco-friendly stationery. Colleagues are encouraged to take their own cups to coffee shops near the office; colleagues in Sydney are encouraged to do the same thing, but if they forget, the office manager takes away collections of disposable cups for recycling.

And our global lunchtime legend competition encourages colleagues to bring in lunch and snacks from home rather than buying lunches that involve lots of single use plastic wrapping.



Plans for 2021-22

- Calculating our scopes 1, 2 and 3 emissions across our operations globally and making recommendations to reduce our carbon footprint.
- Reviewing the implementation of our Travel Purchasing Policy and whether further encouragement and support from the company is required to help our people choose greener ways to travel.
- Continue to help local communities with at least two projects annually.





Anti-Corruption

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

Our policy commitment

Control Risks' commitment to the Tenth Principle is expressed in our Code of Ethics, which is available on the [corporate responsibility section](#) (see Ethics) of our website: www.controlrisks.com

Business integrity goes beyond compliance with the law, and involves the application of our core values. Control Risks does not pay bribes directly or indirectly and does not engage in any acts of corruption including the facilitation of tax evasion. Control Risks' employees are expected to use their judgement not just to avoid malpractice but to promote good practice in accordance with the company's commitment to high standards of integrity.

We elaborate on this statement in our Anti-Bribery and Anti-Corruption Policy, which is also available on our website. The policy makes specific reference to the UK Bribery Act and to the US Foreign Corrupt Practices Act (FCPA). At the same time, it affirms Control Risks' commitment to abide by all national laws relating to bribery and corruption in the jurisdictions in which we operate. The policy covers: bribes and kickbacks; facilitation payments; public officials; gifts, hospitality and expenses; personal conflicts of interest; charitable donations; political activities; business relationships; and audits and accounts.

Other related policies and procedures address client and project risk management, subcontractor management, and whistleblowing. Control Risks includes corruption risk assessment as an integral part of our review process before taking on new clients. In our standard Terms and Conditions for all client engagements, Control Risks agrees and warrants that it will not engage in any activity that would constitute an offence against national or international anti-bribery laws, and that it will maintain appropriate policies, procedures and training to prevent acts of bribery.

People and processes

Internal training and awareness raising

New employees are required to complete an e-learning anti-corruption training module when they join the company, and we reinforce our business integrity message through regularly updated training packages. As part of this ongoing cycle of mandatory compliance training, all employees were required to undertake our e-learning training in April 2021. The next round of company-wide anti-corruption training will take the form of live workshops.

Third parties and subcontractors

Our Code of Ethics, our Anti-Bribery and Anti-Corruption Policy, and our training all place particular emphasis on

the potential integrity risks associated with third parties and subcontractors. Our overall policy is stated in our Code of Ethics:

Control Risks expects its suppliers, subcontractors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own.

Our Subcontractor Management Policy supports the Code of Ethics by requiring a rigorous set of compliance procedures for the selection, preparation, engagement, training and management of subcontractors. This includes an online screening and management tool to support the implementation of this policy. The tool's key features include the automation of our bespoke vetting process workflows, and the creation of a centralised record of the completion status for each subcontractor. This ensures consistency in the application of our vetting process, and makes it easier to audit compliance. The tool also enables us to distribute training courses to our subcontractors and track their completion. Control Risks employees responsible for managing subcontractors are expected to reinforce our contractual requirements by giving them verbal briefings on our Anti-Bribery and Anti-Corruption Policy, and to issue reminders whenever necessary.

Anti-corruption risk assessments and reviews

Our Group Risk Director and Group Internal Auditor conduct regular risk reviews and internal audits of all key business units and offices, with a focus on anti-corruption. Corruption-related risks and measures to address them are a recurrent feature of the risk registers prepared by country offices and project managers.

Similarly, business integrity is a key part of the risk assessment process that we undertake before accepting or bidding for new projects. Our Client and Project Risk Management Policy makes clear that “Control Risks is committed to the highest standards of business integrity. We will not take on any assignment that requires us, the client or a third party to pay bribes”.

Internal whistleblowing and ethics consultation procedures

As noted above (see Human Rights section), our employees are encouraged to make an anonymous report if they suspect that a staff member is engaged in unacceptable or unethical conduct – including corruption – and feel unable to raise the issue with their line manager. Employees who wish to raise a concern anonymously are encouraged to make contact with a hotline managed by a reputable third-party provider that operates independently of the company management.

Similarly, employees are encouraged to consult the company’s Ethics Committee if in doubt about the ethics of specific business initiatives or the integrity of potential business partners.

External engagement

Engagement with our clients

Our most important external engagement is with our clients. In this regard, our work ranges from integrity due diligence and risk analysis to policy development, training and complex problem-solving. We serve private sector companies across all industries, as well as government and non-profit agencies.

Examples of our work in the business integrity arena continue to include:



- ▶ Working with our clients to help them to formulate codes, policies and standard operating procedures that are tailored to their particular sectors and requirements.
- ▶ Conducting risk assessments, often supported by data analytics, that are specific to each client’s business model, commercial sector and geographical region.
- ▶ Reviewing and – where necessary – stress-testing anti-bribery and anti-corruption programmes to ensure that they are functioning effectively.

- ▶ Investigating and working with our clients to resolve problems, for example in response to whistleblower complaints.

Engaging with civil society

We are longstanding supporters of the Transparency International UK (TI-UK) Business Integrity Forum, and regularly participate in its meetings. Similarly, our Sydney office is an active member of Global Compact Network Australia (GCNA) while our Berlin and Frankfurt offices support Global Compact Network Germany. In Brazil, Control Risks partner Geert Aalbers has contributed to a course on corruption risk assessment organised by Insper, a leading higher education institute, and the Global Compact Network Brazil.

Since October 2020 John Bray, one of our Singapore-based consultants, has been a member of the Expert Panel advising the UK government on its cross-departmental Business Integrity Initiative. The panel includes representatives from the private sector, civil society organisations, academia, and UK government departments. Its objective is to review the initiative's progress and ensure that it remains relevant to business.

Thought leadership

Control Risks regularly publishes material on business integrity issues

- ▶ Designing both e-learning and face-to-face training programmes. For example, we are currently working with an international company operating in East Asia to support its sales team with “resistance training” on tactics to enable it to deflect or resist demands for inappropriate benefits from buyers.

and anti-corruption best practice on its external website. For example, in our flagship [RiskMap 2021](#) report we highlighted key legal and compliance themes, including regulators' increasing expectations for technology-driven compliance management, noting that digital transformation introduces new risks, including heightened exposure to cyber-crime.

Contributions to external publications and webinars

In September 2020, our consultants Brian Mich (US) and Geert Aalbers (Brazil) contributed to the Society for Corporate Compliance and Ethics (SCCE) annual “Compliance & Ethics Institute” event with presentations on managing data in corporate investigations and conducting international investigations. In October 2020 Control Risks Mexico-based consultant Zoe Philips took part in an American Chamber event on “Fighting corruption and uncertainty in investors' rights in the midst of a pandemic”. Similarly, we contributed to a November 2020 podcast on [Bribery at Sea: it's more than Cigarettes and Alcohol](#) organised by Shoreline, the Bermuda-based specialist maritime

insurance company. Looking ahead to early September 2021, Geert Albers has been invited to contribute to the Vienna-based International Anti-Corruption Academy (IACA) summer school with a presentation on anti-corruption trends in Latin American.

In June 2021, we launched the third edition of the [Capacity to Combat Corruption Index](#), together with the Americas Society/Council of Americas and the Americas Quarterly. The index assesses 15 Latin American countries' ability to uncover, punish and deter corruption based on three factors: legal capacity; democracy and political institutions; and civil society, media and the private sector. The introduction to the index noted that the COVID-19 pandemic had led governments and civil society to shift their focus away from corruption to other priorities in the year under review. At the same time, the widely reported erosion of democracy in a number of Latin American countries continued. The index was widely reported in external media including Reuters, El Pais and other publications across Latin America.

Plans for 2021-22

- ▶ **Start internal consultation on how to facilitate live training workshops effectively when we are increasingly adopting flexible and remote working. This is in anticipation of the next round of our anti-bribery and anti-corruption training workshops in 2023.**