

# COMMUNICATION ON PROGRESS (COP)

9 July 2020 to 8 July 2021



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# About ARK

ARK Group DMCC (ARK) is a social enterprise, empowering local communities through the provision of agile and sustainable interventions to create greater stability, opportunity and hope for the future.

We believe that strong, resilient communities are the foundation of local, national, regional and international development and stability – and ultimately a safer, peaceful and more prosperous world.

At ARK, we have delivered research and programmatic interventions validating this approach in over twenty countries since 2008. As a social enterprise we work in partnership with communities, our donors, and other implementers to build local capacities, generate opportunity and bring about sustainable change.

## **What makes us different**

We pride ourselves on being the first people able to access and operate in challenging, fragile and conflict-affected environments. We are expeditionary by design and our systems and structures enable flexible and agile responses while ensuring safe, effective and compliant delivery.

Working with and through teams drawn from the communities in which we operate enables us to deliver impactful interventions built on intimate local understanding. In collaboration with our global network of international and local experts, we integrate nuanced understanding of the challenges we aim to solve with best practice and field-leading innovation to deliver programming that meets short-term stabilisation objectives and builds the evidence base and knowledge needed to lay the groundwork for long-term peacebuilding and development programming.

## **What we do**

We enjoy sectoral expertise in civil society development, good governance, protection and human rights, refugees and migration, stabilisation, gender, security and justice, as well as cross-cutting experience in programme design and learning, organisational development and management, research and analysis, needs assessments, donor coordination, monitoring and evaluation, communications and capacity building.

## **Our Story**

ARK was created in order to assist the most vulnerable, particularly refugees, the displaced and those impacted by conflict and instability. This reflects the background and experience of ARK's founder Alistair Harris, whose formative early years were spent seeking to understand and positively impact ethno-sectarian conflict, from Northern Ireland to the Balkans, as well as seek justice for victims of gross human rights violations.

# From the CEO



Alistair Harris OBE  
Chief Executive Officer

To our stakeholders,

I am pleased to confirm that I, Alistair Harris, on behalf of ARK Group DMCC and all its affiliates, in my capacity as CEO, reaffirm our support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Yours sincerely,

Alistair Harris OBE  
Chief Executive Office

# The Ten Principles of the United Nations Global Compact

## 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.

## Labour

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

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

Principle 5: the effective abolition of child labour; and

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

## Environment

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

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

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

## Anti-Corruption

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

*The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.*

## ABOUT THE UNITED NATIONS GLOBAL COMPACT

As a special initiative of the UN Secretary-General, the United Nations Global Compact is a call to companies everywhere to align their operations and strategies with ten universal principles in the areas of human rights, labour, environment and anti-corruption. Launched in 2000, the mandate of the UN Global Compact is to guide and support the global business community in advancing UN goals and values through responsible corporate practices. With more than 9,500 companies and 3,000 non-business signatories based in over 160 countries, and more than 70 Local Networks, it is the largest corporate sustainability initiative in the world. For more information, follow @globalcompact on social media and visit our website at [www.unglobalcompact.org](http://www.unglobalcompact.org). © 2019 United Nations Global Compact 685 Third Avenue New York, NY 10017, USA

# 1.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.

ARK is committed to the highest standards of work and ethical behaviour including compliance with all applicable laws and regulations, as well as company policies, practices and procedures. ARK is a member of the UN Global Compact and respects internationally recognised human rights as established in the [Universal Declaration of Human Rights of 1948](#), the European Convention of Human Rights, the Human Rights Act of 1998 and the International Labour Organisation's Core Conventions. Our support for internationally recognised human rights in our company is consistent with our operational mission to empower local communities to create greater stability, opportunity and hope for the future.

In consideration of the nature of ARK's operations and business practices, ARK concentrates its efforts upon those articles that may be directly impacted by our activities within beneficiary communities. These include the right to life, liberty, and security; the right to freedom of movement; the right not to be subjected to torture and/or cruel, inhuman, degrading treatment or punishment and the right to freedom from slavery.

ARK Employees and Related-Personnel may, in the course of their daily work, due to the nature of the projects and scope of business of ARK, be confronted with severe violations of human rights including, but not limited to, human trafficking and modern slavery. To this effect, ARK Employees and Related-Personnel are provided with training in our human rights-based approach and apply their judgement to determine when a situation may be deemed a violation of basic human rights, and the appropriate reporting procedures.

In addition to ARK Employees and Related-Personnel, ARK considers that our corporate partners also have a direct responsibility to apply ARK's Human Rights Policy against human trafficking and modern slavery, setting an example in condemning issues such as human trafficking and modern slavery and to report suspect situations. ARK uses its best efforts to thoroughly vet supply chain partners through exacting due diligence processes and collaborates with other organisations to combat human trafficking and modern slavery. ARK works continuously for the betterment of human working conditions and endeavours through its implementation of this policy to eliminate human trafficking and modern slavery.

ARK has the following supporting policies in place designed to ensure that ARK, its employees, partners and consultants are not complicit in human rights abuses and to guarantee that its operations support and respect the protection of human rights:

- Human Rights policy, notably sections on Human Trafficking and Modern Slavery
- Child Safeguarding and Protection Policy, which is signed by all staff and partners upon onboarding
- Policy on Protection from Sexual Exploitation and Abuse, which is signed by all staff and partners upon onboarding
- Whistleblowing policy, which details how ARK uses a third-party provider, allowing whistleblowing to be done anonymously and through an independent third-party monitoring provider.

All ARK staff commit to these policies in writing as part of their onboarding into the company. All these policies are also annexed to ARK's partnership agreements, allowing ARK to formally

cascade knowledge of human rights and commitment to fulfilling these rights through its partners.

### **1.1. Actions taken in the reporting period**

ARK has a corporate human rights policy in place, and we continually review our processes and activities with respect to human rights, with records of any changes logged in our policy management system.

All ARK Employees and partners are signatories to the human rights policies. This encompasses non-ARK entities and their employees who have entered into partnership agreements with ARK. All ARK employees must demonstrate commitment to our policy to endeavour to safeguard human rights, and a written commitment is a mandatory part of the individual or organisation onboarding and must be made prior to any work commencing. Regular internal audits, in addition to an external audit, ensure these policies had been agreed to in writing and filed appropriately.

During the previous reporting period, ARK employed an experienced Gender and Inclusion Advisor period to 1) further improve ARK's expertise in this area, and 2) act as a focal point for safeguarding advice and monitoring performance on gender and inclusion at both a corporate level and at an operational level through project implementation. The resulting Gender Action Plan (GAP) incorporated and reinforced ARK's commitment to Human Rights with a particular focus on ensuring gender mainstreaming in all our projects. These plans have continued in this reporting period to reinforce knowledge in these areas through training to ARK staff, project teams and external partners such as grantees. Recommendations carried forward from the previous reporting period ensured gender and inclusion considerations were embedded within ARK's project management systems, and that individual project GAPs were also maintained.

An example of the expansion from corporate-centred human rights initiatives to proactive action to seek opportunities to support the protection of human rights has been demonstrated further this reporting period with the commencement of a project in Nigeria, working with the Nigerian government law enforcement entity responsible for combatting human trafficking and other human rights violations. ARK is providing capacity building support to the organisation, helping them to develop and implement campaigns to deter and disrupt those involved in this abhorrent crime.

ARK maintains an independent, third-party whistleblowing service provider that is available to any ARK employee, partners and service providers. Details of the whistleblowing channels are communicated to all ARK employees and partners regularly and are also included in all contractual templates. If an individual knows or has any reason to suspect that human trafficking and modern slavery has taken, is taking or may take place, they can report concerns either directly to management or through the external whistleblowing service provider. The provider offers numerous channels including email, telephone or text, and offers many languages. The option to report anonymously is also possible. To date, no Human Rights complaints have been received by ARK.

### **1.2. Measurement of Outcomes**

The policy management system continues to ensure all policies are centrally held, disseminated and available to all, and that the related annexes to contractual documents are updated with review dates flagged via automated emails.

Internal and external audits demonstrate compliance with the requirement for employees and partners to commit in writing to comply with the ARK Human Rights Policy. Evidence of progression of GAPs was also measurable during the reporting period, with projects reporting gender mainstreaming activities throughout the reporting period and bi-weekly meetings taking

place with the Gender and Inclusion Advisor and project teams. Project management documentation demonstrated human rights considerations, including gender and inclusion, appropriately integrated.

ARK continued to specialise in projects with a strong human rights protection element. Continuing projects include gender mainstreaming within the Jordan police force, and new projects include supporting anti-human trafficking efforts in Nigeria.

ARK's external whistleblowing provider was assessed as providing a good level of service and the contract was renewed. No cases of human rights abuse were reported via ARK's external whistleblowing channel. ARK managers also confirmed no reports of human rights abuse had been reported via other means.

### **1.3. Actions planned for the next reporting period**

ARK will review and update its Human Rights Policy, the Child Safeguarding Policy, Protection from Sexual Exploitation and Abuse Policy, and the Whistleblowing Policy and distribute these updates to all Staff and Related-Personnel.

ARK will publicise its Whistleblowing hotline service to all staff and Related-Parties in all operational languages. All new partners will be given training on how to use this service and encouraged to disseminate throughout their organisations.

ARK project teams will continue to ensure human rights considerations are integrated into standard project management tools and outcomes.

ARK's business development team will continue to seek opportunities to support the reduction of human rights abuse through our work.

ARK will expand its efforts to support security and law enforcement efforts to work towards gender equity and improved human rights by working with our key stakeholders to expand opportunities for capacity building and training.



## 2. Labour

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

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

Principle 5: the effective abolition of child labour; and

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

ARK recognises that our people – whether they are employees, consultants, or engaged through our project partners, are truly the core of our business. Our commitment to the fair treatment, diversity, equality, well-being and development of our people is the foundation of our culture and all we do.

Employees have the right to collective bargaining, although there have been no instances to date with staff instead choosing to raise any queries at an individual level.

Forced and compulsory labour, as well as child labour, has no place within ARK or our partners, and this is clearly stated in our Human Rights and related policies.

To ensure recruitment activity that supports commitment to the United Global Compact, and in accordance with its Code of Conduct, ARK's Human Resources policies include recruitment standard operating procedures which are in line with all ILO standards, as well as the UK's Conflict Stabilisation and Security Fund and Department for International Development code of conduct, and US State Department guidelines. The policies are implemented at all stages of the employees' process within the company, from recruitment to end of contract, and ARK's HR department liaises regularly with external counsel to ensure compliance with all local regulations where we operate. These procedures ensure risk of discrimination is minimised at the entry point into the company. Once engaged, staff are protected by anti-discrimination policies and by a culture of diversity.

ARK complies with not only minimum wage standards where relevant for all its employees, but as part of its usual process, ensures that the wage offered allows for decent living in the corresponding country or city. These are benchmarked against industry and local standards and in all cases are greater than the applicable minimum wage.

ARK uses timesheets to track time spent working on projects by all staff and consultants, both for compliance reasons, but also to ensure that all time spent working is reimbursed fairly and transparently. It also gives managers the ability to manage staff well-being and work-life balance. To further support this position on staff well-being, employees receive an annual leave allowance that in all cases is over and above that required by local labour law. All these actions ultimately support equal opportunities.

### 2.1. Actions taken in the reporting period

#### **Culture:**

Our culture of sustainable development is underpinned by our Code of Conduct and our Human Resources policies including Recruitment, Compensation, Protection from Sexual Exploitation and

Abuse, and Whistleblowing. Ultimately it is driven by staff who come to the international development sector and to ARK with the aim of contributing to programmes that, as with the Global Compact Fund, are based on our CEO's commitments to implement universal sustainability principles and to take steps to support UN goals. The Head of Communications hired in the previous reporting period has continued to work with the CEO to create opportunities such as Town Halls to further embed this culture, and to create frequent communications relating to ARK's positive community impact. With so much of ARK's project work focusing on the elimination of discrimination in respect to employment and occupation, these communications are seen by all staff and contribute to a culture of diversity, equality and inclusion.

### **Diversity, Inclusion and Equality:**

As well as sustaining our high levels of diversity, ARK is proud to have sustained the gender equality achieved in the previous reporting period in terms of the proportion of men and women in our company. The Senior Management Team continues to have equal representation from men and women. The Gender and Inclusion Adviser continued to improve company understanding of issues relating to diversity and inclusion, as well as contributing to programmatic planning and execution with bi-weekly mentoring sessions with project teams to identify and develop opportunities within project activities to promote inclusion and equality. Additional related actions are referenced below in Women in the Workplace.

### **Recruitment:**

The Hiring Management System contract was renewed, viewed as a vital tool in supporting fair and inclusive hiring decisions. The system ensures recruitment is structured and transparent, as well as documenting every stage of the process for compliance and development purposes.

### **Well-being, Flexible Working and Women in the Workplace:**

Staff well-being continues to be a high priority as working life is disrupted due to the ongoing COVID-19 pandemic. ARK provides support to staff via access to external professional services including online, telephone or in-person counselling, financial services support, and private health insurance. Flexible working is now incorporated into working life at ARK, with all staff able to work from home. We produce guidance for working from home, as well as practical support for staff who have challenging childcare arrangements as and when schools invariably lockdown. This approach has meant that the global data demonstrating the effect of the pandemic in the form of women leaving the workplace has not been seen at ARK, where we strive to ensure all staff are supported so they can continue to function positively in their role.

Women on maternity leave during the reporting period have continued to receive maternity pay and leave benefits over and above those required by local labour law, a benefit ARK maintains due to the importance of this action in the overall goal of equal opportunities.

Annual leave allowances continue to exceed those required by local legislation and a culture of utilising leave encourages staff to optimise their work-life balance.

### **Group-wide regulations and standards:**

Company policies underpinning the human rights and labour principles available to staff include: Prevention of Sexual Exploitation and Abuse; Human Rights; Whistleblowing; Recruitment; Compensation; Health, Safety and Wellbeing; Child Safeguarding and Protection, Due Diligence; Anti-Bullying and Harassment. The following policies were also reviewed in the reporting period: Anti-Fraud, Bribery and Corruption, and Corporate Social Responsibility, with the updates communicated to staff. These policies reinforce our commitment to the UN Global Compact's principles on Labour.

### **Feedback and Reporting:**

Staff have a variety of ways to give feedback or raise concerns. This varies from informal opportunities in our regular Townhall sessions, attended by the CEO and all employees, to more

formal opportunities structured through Human Resources policies. In addition, an external whistleblowing service provider, with a safe and confidential reporting system (accessible in many different languages) is available in case any member of staff or partner needs to be supported in raising concerns of wrongdoing in the workplace, including issues that would relate to Principles 3, 4, 5 and 6 of the United Nations Global Compact. An internal communications campaign 'Speak-Up' means that our people are aware of how to contact the whistleblowing provider if needed.

### **Our Partners:**

ARK's high standards in all areas relating to the protection and positive treatment of people are also expected from our project partners, and our suppliers. Company policies are shared on initial engagement as part of the contractual documents. The 2020/2021 reporting period saw ARK successfully implement various capacity building initiatives to help our partners implement the UN Global Compact principles.

## **2.2. Measurement of Outcomes**

All ARK recruitment in the reporting period was fully documented with justifications for selection criteria using our Hiring Management System and Recruitment Approval forms. Remuneration was in line with our salary bands Employee Allowance and Salary Scale Overview, with equal pay demonstrated. These processes were independently audited by an external audit firm who reviewed samples from these processes in line with normal audit schedules mandated by our donors, with no issues identified.

We are pleased to report we maintained gender equality in terms of the proportion of men and women in our company and an equal proportion of men and women in senior roles. ARK was also able to demonstrate men and women received equal pay for equal work.

ARK has continued to deliver capacity building support to empower female police officers in Jordan providing them with the skills and experience they need to work alongside their male colleagues in operational roles.

## **2.3. Actions planned for the next reporting period**

All HR and related policies will be reviewed to integrate any lessons learned throughout this reporting period.

With wellbeing vital in reconciling work and family life, thus supporting equal opportunities, a wellbeing campaign will be rolled out to all staff, focusing on mental health and work to challenge the stereotype of what mental illness can look like, and to increase acceptance of asking for help and support.

A gender and gender pay report will be conducted to ensure our achievements to date in this area are maintained.

With the introduction of new labour legislation into the UAE in February 2022, there will be significant actions to be analysed and implemented.

ARK's work to support female police officers through capacity building activities will continue in the next reporting period allowing us to train more female officers and provide additional officers with opportunities to work in operational roles alongside their male counterparts.

## 3. Environment

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

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

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

### 3.1. Actions taken in the reporting period

ARK continues to work on environmental issues through its Green Team and periodic environmental reporting. Throughout the reporting period, ARK has continued its recycling initiatives. During the previous reporting period, ARK had already transitioned in two of its locations to virtual and shared office spaces in an effort to minimise carbon footprint. Due to frequent COVID-19 lockdowns, consumption and purchase of office supplies also reduced during the reporting period as ARK transitioned to virtual digital working. No printing paper was purchased during the reporting period as work is now primarily paperless.

E-waste initiatives included updating mailing lists to reduce unnecessary correspondence, removing ARK's shared mailbox email address from several marketing databases. In addition, all staff have updated signatures to add *"Please consider the environment before printing this email"* footer to nudge staff and external stakeholders to reduce paper usage.

The Jordan and UAE offices were fitted with air filtering plants. In addition, the Jordan team moved to a new office that has environmentally efficient features including an air conditioning system that has an A++ energy rating and has washable filters, as well as energy saving light bulbs. In conjunction with the office move, the team organised a largescale donation and recycling effort for obsolete furniture and equipment.

ARK's Lebanon office was impacted by the 4 August 2020 Beirut explosion. While the office suffered extensive damage, environmental factors were considered in the aftermath and recovery. The team ensured that damaged material was reused wherever possible, including aluminium frames, door frames, ceiling tiles etc. Waste material during the repairs was collected and disposed of by a dedicated company sorting and delivering waste to points indicated by the municipality for later recycling and appropriate disposal. Double glazed windows and doors were installed during the refurbishment of the office to maximise insulation and reduce energy usage for heating and cooling. In 2021, ARK's Lebanon office also organised a large clear-out initiative of its Beirut office, sorting old furniture, equipment and paper archives. As a result, a large donation was made to a local NGO so items could be re-used. Obsolete items were sent to a recycling facility run by an NGO supported by ARK in the Shatila camp, therefore re-using materials such as paper, wood and metals.

Air travel continues to be minimal. A carbon offset payment was made in February 2021 via Carbon Footprint Ltd to support a global portfolio of verified carbon reduction projects.

ARK is also advocating for environmental initiatives where possible within its project delivery. Under the Palestinian Community Resilience Building (PCRB) project funded by the UK Government, ARK and its partner Ahlam Lajea Association (ALA) are working across six Palestinian refugee camps in Lebanon. To mitigate environmental risks and enhance people's perception of environmental issues and protective practices, ARK implements an environmentally-focused grant located in Shatila Camp.

Having launched during the second year of the PCRB project with 100 direct beneficiaries, the facility now employs 150 at-risk individuals the majority of whom are vulnerable youth with past involvement in negative coping strategies including drug addiction, drug distribution, and criminality. The facility operates effectively with 150 tons of garbage from 1,200 homes collected in Shatila camp and the adjacent areas, sorted, and recycled to date. 133 tons of recycled material from the collected garbage was sold, promoting the sustainability of the project. In addition, the facility produces agricultural water pipes and plastic sheaths for electrical wiring from the recycled materials that can be sold on the open market to produce revenue that supports the facility's operational costs. Furthermore, during the project's third quarter, ARK and its partner ALA will expand the garbage collection capacity to reach Burj al Barajneh Camp in Beirut and the adjacent areas.

This initiative has improved garbage collection mechanisms in the camp, enhanced perceptions of recycling and upcycling waste amongst individuals, protecting the environment from further deterioration and countered environmental challenges facing the Beirut camps and the adjacent areas. Moreover, it has provided the beneficiaries with positive alternatives, new skills, and economic opportunity.

### **3.2. Measurement of Outcomes**

ARK continues to be a member of the Green Business Bureau with 'Gold' status/seal. Significant quantities of paper have been recycled across ARK's offices. In the UAE, only 4kg of paper was recycled during the reporting period due to paper use being nearly eliminated in the UAE head office.

In total 87 items of furniture and 29 electronic items were donated to local organisations in need in Jordan. Three laptops and one phone were recycled through ARK's local recycling partner JoCycle. The clean-up initiative by the Lebanon office resulted in 40 items of furniture and 34 electronic items being donated and recycled. In addition, paper archives sorted resulted in approximately 50 boxes of paper being recycled.

ARK also continued to minimise air travel, virtual meetings becoming the norm. Carbon emissions have dropped from 90,638 kg. to 23,616 kg.

### **3.3. Actions planned for the next reporting period**

Although restrictions to mobility and health and safety precautions continue due to COVID-19, ARK recognises the importance of continuing its environmental efforts. ARK will continue its recycling efforts in the various country offices to downsize its office footprint even further. ARK will continue to keep international travel to the minimum required to manage ongoing projects and to maintain staff welfare. Travel approvals will continue to be scrutinised carefully before sign-off from senior managers, both for risk and to maintain the trend of reducing our corporate emissions further.

## **4. Anti-Corruption**

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

### **4.1. Actions taken in the reporting period**

ARK has continued to improve its anti-corruption policies and procedures. During the reporting period, ARK has worked on streamlining its gifts and hospitality policy, increasing oversight and monitoring by consolidating country and subsidiary level reporting to Group level.

There has been a heavy emphasis on training, both internally and with external stakeholders. In addition to routine training, ARK held an extensive two-day training to all staff on grant subrecipient management and compliance, focusing on monitoring and required financial controls when working with downstream partners. As part of ARK's standard operating procedures, all partners who receive grant funding from ARK also went through extensive compliance training as part of ARK's strong emphasis on anti-corruption efforts. Capacity building of local partners in fiscal responsibility and compliant use of donor funding continues to be a top priority for ARK. Training efforts in the reporting period were focused on Jordan, Lebanon and Yemen.

During the reporting period, ARK successfully completed a Single Audit, which is an organisation-wide audit not only of ARK's financial statements, but also of internal policies and procedures and compliance with donor regulations. This annual audit requirement set by the US Government gives ARK an opportunity to continuously improve its policies and procedures. The audit is independent of ARK's annual financial audit.

### **4.2. Measurement of Outcomes**

All new ARK partners have been trained by ARK on anti-corruption processes with records documented in the appropriate procurement files. The partners' processes are subsequently validated by ARK finance managers and procurement staff ensuring compliance with our anti-corruption policies and values.

ARK's Senior Managers continue to monitor the Gift and Hospitality register with no concerns identified due to strict adherence to the appropriate policies, awareness raising activities and staff training. The Gifts and Hospitality policy was reviewed and updated in March 2021.

All ARK staff have updated their Conflict of Interest declarations as required annually, with reminders and policy refreshers sent throughout the year. The Procurement Department updated its Procurement Policies and Procedures Manual in March 2021, which solidified the Department's handling of Conflict of Interest situations in the procurement context. The Corporate Services Department was trained on Conflict of Interest procedures, and in particular training on the ARK Conflict of Interest and Confidentiality Agreement form.

### **4.3. Actions planned for the next reporting period**

Efforts continue in training of new partners and providing support to existing partners. ARK is also looking to carry out an annual review its risk assessment procedures for selection of grant recipients.

Annual reviews on the anti-corruption policies will continue as planned.