

## WS Insight Ltd - Communication on Progress

### Statement of the CEO

1<sup>st</sup> February 2022

To our stakeholders:

I am pleased to confirm that WS Insight Limited reaffirms its support of the Ten Principles of the United Nations Global Compact; in particular 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 share this information with our stakeholders using our primary channels of communication.

Additionally, we are certified in all Areas of Operations to the International Standards of ISO9001:2015, ISO18788:2015 and PSC-1. The business is also compliant and members of TRACE, which enables the business to ethically deliver compliance within the frameworks of the US Foreign Corrupt Practices Act, UK Bribery Act and other anti-bribery legislation.

The business continues to work and liaise with ICoCA to deliver training to deliver best practice within the PSEA context across our employee and client markets in Africa.

Sincerely yours,

Ashton Towler,

CEO



## 1. Human Rights



## Assessment, policy and goals

WS Insight is an active member of the International Code of Conduct for Private Security Companies (ICoCA). Consequent to this membership is its full support of the Universal Declaration of Human Rights as demonstrated by the documented Human Rights policy and Code of Conduct for its Staffs and Employees.

The company has established and documented the Modern Slavery Policy, Diversity Policy, Whistle-blower Policy, Grievance and Complaints Policy among other staff focused guidelines.

The ideals within these policies are ingrained in the company's workforce through its Induction/Onboarding process, its inclusion in the formal Basic Guard Course as well as communication through internal company documents and the company website, as far as is applicable.

## Implementation

Internally, the Compliance and HR Departments drive the implementation of the policies through the entity and department heads. Externally the Logistics department for instance carries out supplier evaluation and due diligence in which ethical conduct is a key component of the assessment.

Its Integrated Management System (IMS) certification to ISO 9001:2015 is implemented across all of the operational entities of WS Insight, this allows for a mainstream risk-based management of the business operations. In addition, Human Rights Risk Assessment is now a core part of the planning process by the entities, which is a requirement to maintain compliance to ISO 18788:2015 and our membership of ICoCA.

A specific Whistle-blower confidential line and email address are set-up and maintained and are fully available to all staffs/employees. The Head of Compliance and Assurance is responsible for the protection of Human Rights, Grievance and the Whistle-blower processes within the company.

## Performance Monitoring & Evaluation

The Company has documented processes that outline the indicators which can be used to measure achievement of its goals.

On a monthly basis, the entities produce performance data which demonstrates progress within the month. Incidents of Human Rights violation would be captured within these metrics and trends, and closely monitored for corrective/preventative actions. The company utilises real-time internet-based monitoring of such metrics which enables an immediate response to any instances of Human Rights violation.

There have been no incidents of human rights abuses associated with the company during the reporting year, and no complaints or grievances lodged.

Monitoring and evaluation will continue under the transition of process to align with ISO 18788:2015 and PSC-1 which is being undertaken across the group.

## 2. Labour

WS Insight Ltd fully supports the core conventions of the International Labour Organisation (ILO) and the relevant labour legislation in all operating countries. Furthermore, WS Insight is registered with the local OHSE organisations in each country and operates management systems in alignment with internationally recognised standards (ISO45001:2018).

Insight operates a comprehensive human resources department and maintains policies clearly stating employee rights and responsibilities, compensation and benefits. Alongside a detailed HR operating manual, employees are issued with an employee handbook outlining their rights and responsibilities, including code of conduct, terms and conditions of employment, benefits, disciplinary procedures, performance reviews and the company grievance procedure.

WS Insight operates a comprehensive risk management system which falls under obligations to ICoCA and compliance with PSC-1 and ISO 18788:2015. Labour related risks are considered and mitigated within this framework.

### Implementation

Insight maintains a comprehensive and process driven grievance policy with oversight from the International Code of Conduct (ICoCA). The grievance process is confidential, and available at company offices and for download from the company website. Insight also maintains a Whistle-blower policy driven via a confidential phone line and email address.

Insight acknowledges its duty of care towards staff and employees (and all those who may be affected by its operations) and maintains Health & Safety policies and procedures in accordance with ISO 45001:2018.

Insight maintains a policy on diversity in the workplace and endeavours to promote this policy through communication, awareness, management and training.

The Company regularly consults and communicates with employees and staff through internal messaging, a staff journal and through social media platforms. Structured supervisory and mentorship programs allow for a free flow of communication both up and down the employment chain. Insight maintains a process of visually felt leadership which provides documented welfare and pastoral care.

Insight maintains a dedicated recruitment and selection process that ensures all applicants are above the legal age of 18 years old, and are not discriminated against based on age, religion, race, or gender.

Insight maintains a structured Human Resources department which is directed at group level and administered in-country. The Company's labour policies fall under external third-party scrutiny of the ICoCA membership.

Any form of sexual exploitation and/or abuse-based violence is always prohibited and deemed

unacceptable. The business remains vigilant to all instances of abuse within the guidance to Preventing Sexual Exploitation and Abuse (PSEA) in accordance with our continued ICoCA membership.

### Measurement of outcomes

The company compiles and monitors performance by comprehensive monthly outputs across the group which are reviewed and assessed by the group executive team. Such statistics include, but are not limited to: diversity ratios, sickness returns, accident analysis, complaints and grievances, labour cases, supervisory interaction, mentorship, staff retention, health & safety returns and staff appraisals.

Any violations of the Global Compact Labour Principles would be subject to a clearly defined investigation process, although to date there have been no incidents that have warranted said action.

All related outputs are reviewed monthly by the group executive team, and policy and processes subject to annual management review, which is documented under the requirements of our aforementioned certified standards which are subject to independent scrutiny by the company's certifying body and ICoCA certification and monitoring arms.

## 3. Environment

### Assessment, policy and goals

WS Insight supports a precautionary approach to environmental challenges and undertakes initiatives to promote greater environmental responsibility. The company encourages the development and diffusion of environmentally friendly practices.

Insight maintains an environmental policy and aligns its practices in accordance with ISO 14001:2015 alongside its existing IMS.

An annual risk assessment demonstrates that the company's activities have a relatively minimal impact on the environment, however this does not diminish its responsibility in this area, and the company's endeavour to minimise its environmental footprint. Insight complies with all local environmental requirements, and those of clients and stakeholders with whom it interacts.

### Implementation

Insight encourages workplace behaviour that promotes environmental stewardship and helps reduce energy consumption. Such steps include, but are not limited to:

- switching off lights, computers and air-conditioning when leaving offices or workstations
- effectively sealing the building envelope when using air-conditioning
- using double sided printing where practicable

- the proper disposal of waste (including batteries) and the use of re-cycling where possible
- the analysis of fleet fuel consumption, and the training in best practice driving techniques to promote fuel efficiency
- the reduction of plastic usage, predominantly the reduction of plastic water bottle use.
- the insistence on suppliers that products and services are provided from sustainable sources
- progressing towards a more paperless work set-up in the day-to-day operations

The stewardship of the company environmental policy is the responsibility of the Head of Compliance and Assurance, this is disseminated throughout the business operation via a dedicated organisational structure.

### Measurement of Outcomes

The company carries out annual environmental risk analyses. To date there have been no incidents of non-compliance within our alignment to ISO guidelines, and Insight has not been subject to any statutory notices.

The company has sustained the internal auditing of each entity as part of the QHSE internal audit process audit and subsequent findings are reported appropriately, raising non-compliance if required, implementing corrective action, and setting out an annual environmental plan for periodic evaluation and monitoring.

Incidents will be subject to appropriate investigation and mitigating action as part of the defined policy and accompanying processes.

## 4. Anti-corruption

### Assessment, policy and goals

WS Insight is committed to maintaining the highest standards of honesty, openness and financial accountability. The Board considers all malpractice with the utmost priority, whether it may be committed by senior managers, staff, suppliers or contractors.

Insight has zero tolerance for corruption. Company policy prohibits bribes and facilitation payments of any kind and the company believes it is important for organisations to play a major role in identifying and eradicating corrupt business practices. It therefore supports the objectives of the UK Bribery Act passed in 2010, and the UN Convention Against Corruption. Whilst Insight believes its existing framework and the nature of its business to uphold the law and protect clients from criminal activities of all kinds, embodies the core principals of the act and convention, the company maintains close vigilance on required measures and the adequacy of its existing approach.

Ethical conduct messaging is communicated across the group in the form of poster campaigns and

social media platforms. These give guidance on what action to take when confronted with extortion or bribery. The company maintains a whistle-blower mechanism in the form of a confidential phone line and email address.

The company is in the process of carrying out a full review of its Supply Chain and gaining further understanding and due diligence from our ethical risk analysis as part of its overarching risk management protocols and obligations. This is in accordance with its continued membership of ICoCA and compliance within the associated standards ISO 9001:2015, ISO 18788:2015 and PSC-1. All Suppliers are obliged to undertake a comprehensive ethical conduct and due diligence process prior to entering into a contract.

The business is also compliant and members of TRACE, which enables the business to ethically deliver compliance within the frameworks of the US Foreign Corrupt Practices Act, UK Bribery Act and other anti-bribery legislation.

## Implementation

As described herein the company maintains an Ethical Conduct Policy which is communicated throughout the operating entities, and available for download on the company website. Ethical conduct messaging is communicated across the group in the form of poster campaigns and social media platforms. These give guidance on what action to take when confronted with extortion or bribery. The company maintains a whistle-blower mechanism in the form of a confidential phone line and email address.

Further to this, ethical conduct is included in staff basic training as an individual module of the training syllabus. This is further strengthened by continuation and refresher training.

Suppliers are obliged to undertake a comprehensive ethical conduct diligence process prior to entering into a contract.

Any breach of the company's ethical conduct policy is investigated and where appropriate brought to the attention of the relevant authorities in the country of operation.

Insight is further subject to external third-party scrutiny by virtue of its membership and active participation with the International Code of Conduct (ICoCA) and its monitoring function.

The responsibility of the application of ethical conduct across the group lies with the company's Head of Compliance and Assurance, who sits on the group executive team and reports to the CEO.

## Measurement of Outcomes

As previously mentioned, the company investigates any incidents of corruption and appropriate action is determined by the CEO, Group Management, supported by the board of directors.

The company maintains a full-time Head of Compliance and Assurance, whose outcomes are regularly reviewed to ensure consistency with the company's anti-corruption commitment and its exposure to reputational risk.

To date there have been no allegations of corruption that have required investigation.



Insight has conducted an extensive internal ethical risk assessment to identify possible areas of weakness and implement appropriate mitigating action. Going forward, this will provide measurable platforms and targets for appropriate review.

