

The Global Compact

The Risk Advisory Group

From 10 March 2021 to 10 March 2022





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1. CEO's statement of continued support for the UN Global Compact and its Ten Principles

I am pleased to reaffirm The Risk Advisory Group's continued support of the Ten Principles of the UN Global Compact.

2021 continued to present us with a multitude of challenges as a result of the Covid-19 pandemic. We continued to adapt our ways of working and business processes to take account of national lockdowns and office closures across our international network. The significant curtailment of business travel continued.

In some respects these extraordinary events made it easier for us to continue to deliver on our sustainability goals, in particular as a consequence of a substantial reduction to our environmental impact. Now we have rolled out our hybrid working policy and have greater visibility into what business practices will look like for the foreseeable future and the challenge for 2022 will be to ensure that we continue to improve against the set of principles provided by the UN Global Compact.

This is our fifth annual Communication on Progress, in which we describe our actions to continually improve the integration of the UN Global Compact and its principles into our business strategy, culture and daily operations.

We are committed to sharing information about our activities and progress with our stakeholders using our website, social media presence and direct communications. We are delighted to take queries and suggestions from anyone associated with the business.

Yours,

The Risk Advisory Group



2. Human Rights

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2:

Businesses should make sure that they are not complicit in human rights abuses.

2.1. Commitment

Risk Advisory is committed to protecting and promoting human rights. Our Human Rights Policy, which was introduced in 2019, is based on the principles found within the UN Global Compact. The policy refers to the principle of 'Do no harm' and stakeholder engagement; freedom of association; health and safety; labour; working hours, salary and benefits; diversity; and security. It also informs employees and subcontractors on implementation and investigations.

Our Ethical & Code of Conduct Policy demonstrates this commitment to ensuring safe and healthy working conditions, non-discrimination in employment practices, guarding against use of forced or child labour, providing access to basic health, education, housing for workers when needed, and accommodating employees' religious observance and practices.

Our Supplier Code of Conduct demands similar standards from our suppliers and sets out our aim to provide decent work, and to produce decent goods and services that improve lives. It also considers forced displacement, the protection of economic livelihoods of local communities, contribution to public debate, enabling girls education and ensuring a diverse workforce. Our Supplier Code of Conduct can be found on our [website](#).

2.2. Policies and processes

Our induction programme for all staff includes ethical and code of conduct training, which ensures that staff are familiar with our Ethical and Code of Conduct Policy. This is supported by our Whistleblowing Policy which provides staff with a process to raise or report any ethical or legal issues to senior management for investigation.



Our Ethical & Code of Conduct Policy states:

Employees must also respect the rights of other employees and third parties. Their actions must be free from discrimination, libel, slander or harassment. Each person must be accorded equal opportunity, regardless of age, race, sex, sexual preference, gender identity, colour, creed, religion, national origin, marital status, handicap or disability.

This is supported by our Human Rights Policy which states:

Respect for human rights is fundamental to the sustainability of the communities in which we operate. We are committed to ensuring that all individuals are treated equally, with respect and dignity.

2.3. Activities

Our Human Rights Policy seeks to protect human rights within and outside of the organisation, while also informing our employees on tools for investigations and reporting in the case of any human rights violations.

For the various security sector development projects we deliver, we have fully incorporated the UK government's Overseas Security and Justice Assistance (OSJA) Human Rights Guidance¹ into our approach to risk management. This means that we have a designated OSJA lead who advises our personnel on the process. We clearly identify, manage, and mitigate risks of doing harm in the delivery of our services. This is underpinned by, firstly, continuous monitoring of human rights risks identified for any project intervention, and, secondly, regular controls of our wider supply chain.

As part of our commitment to ensuring that we fully respect human rights, we have developed a number of mechanisms for our staff and contractors to raise any issues or concerns they may have. These include:

- The appointment of two members of staff as independent advisors. These provide staff with an avenue to get advice outside their line management structure and formal channels.
- Our Grievance Procedure, which provides clear instructions on how to formalise any complaints and sets out our commitment to investigating any matters raised.
- Our Disciplinary Procedure, which sets out clearly the process for investigating any complaints raised involving issues including harassment, bullying, bribery, corruption, dishonesty, and acts of violence and aggression.

Over the past year, we have continued to raise awareness of our employee assistance programme, which provides impartial, confidential advice 24 hours a day, 7 days a week. As a result of the

¹ Overseas Security and Justice Assistance (OSJA): Human Rights Guidance, HMG, 2017.



pandemic, the majority of our staff have been working remotely for long periods and the employee assistance programme provides an alternative route for staff to get advice and support where necessary.



We also run online training, on an annual basis, for all staff covering dignity and respect in the workplace. Diversity, inclusion, respect and teamwork are all pillars of the culture that we strive to create to attract, promote and retain employees across the business. This tailored training programme, coupled with our global anti harassment policy, is designed to educate us and remind us about acceptable behaviour in our office environment.

In 2021, to raise awareness of human rights and sustainability we hosted Lindsey Block, head of partnerships and capacity building in the ethical trade team at Primark as part of our ongoing Women in Compliance initiative. She shared her thoughts on sustainable practices in the fashion industry with both internal and external attendees.

We also ran an internal seminar to mark the UK's anti-slavery day. Tim Roberts, Risk Advisory's head of litigation support, presented a case study based on an investigation he worked upon to highlight how modern slavery can affect businesses, and the techniques that can be used to conduct a thorough investigation.

No complaint in terms of a violation of human rights has been reported to date. We believe that this is due in part to our continued dedication to ensure an inclusive work environment for all.



2.4. Plans for 2022-2023

This year, we will continue to focus on education and awareness raising across all four pillars of the UN Global Compact. By continuing to train attention on these issues, we hope that our staff will increase awareness of human rights while also increasing respect and tolerance of differences.



3. 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

Principle 6:

The elimination of discrimination in respect of employment and occupation.

3.1. Commitment

Risk Advisory is committed to the UN Global Compact's labour principles. We do not tolerate any form of forced, compulsory or child labour in our business or its supply chain. We are proud of our diverse and inclusive culture and we are fully committed to equal opportunities and employment rights across our global workforce.

We value our people for their skills, experience and potential and our inclusive environment is such that everyone's contribution is recognised, valued and respected and it is our policy not to discriminate against any of our workers, as detailed in our Diversity & Equal Opportunities policy.

3.2. Policies and processes

3.2.1. People Strategy

We are committed to delivering a global people strategy, which puts our staff at the heart of everything we do. We continued with our plans to develop staff at all levels, focusing on their individual career aspirations and the needs of the business. To support this, a career framework was developed and a key theme for 2022 is to roll that out across the business. This will assist us in developing and retaining staff. Giving us the opportunity to focus on honest conversations, our talent pipeline and succession planning.

The framework creates a clear pathway for professional development, allowing our staff to thrive in the role that they are employed to do and grow into their next role, providing clarity on what they need to do to progress within the organisation.



3.2.2. Other policies and undertakings

Our People Strategy continues to flow into other policies and processes, demonstrating the care and attention we have for the rights of our people. We recognise that everyone is different and we encourage people to be themselves, promoting this through our policies to our staff, contractors, clients and suppliers.

3.3. Activities

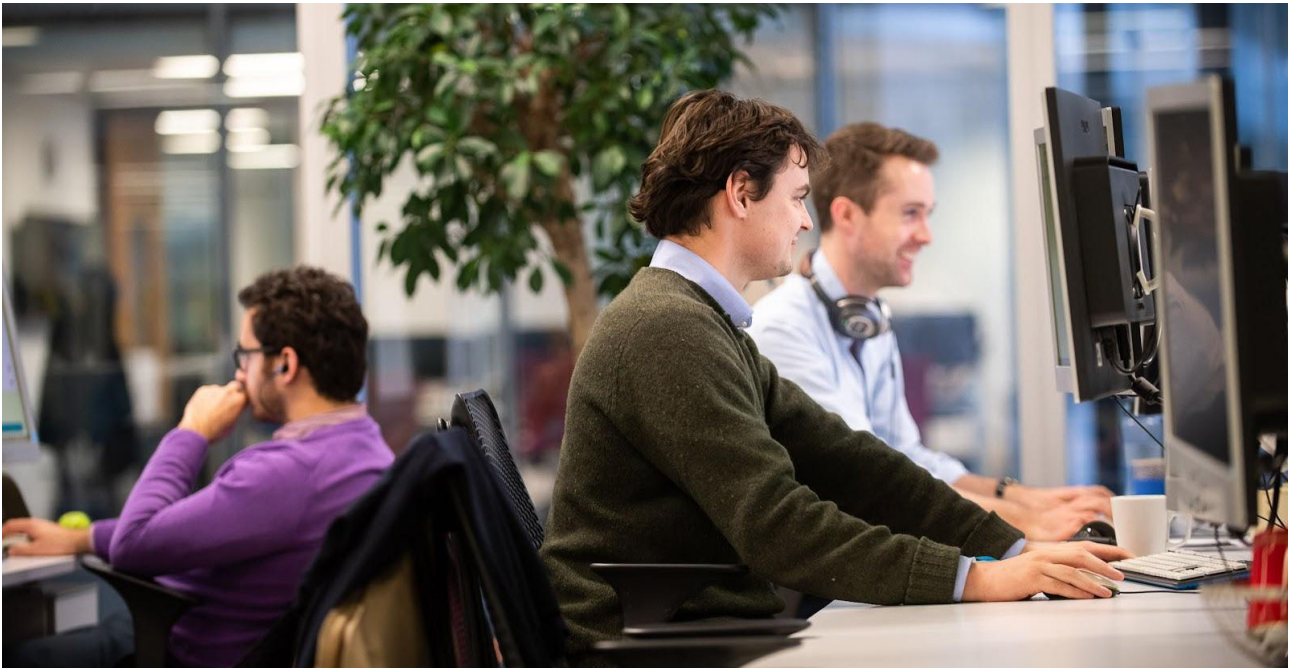
3.3.1. Internal

During 2021, we broadened the scope of working from home and our people had adapted well to this new way of working. The change was mainly due to the ongoing Covid-19 pandemic, but as we move out of that phase, hybrid working has become a part of how we work.

We have rolled out a hybrid working policy across the business globally. We are committed to improving the working lives of our staff and the hybrid working policy encourages a healthy work/life balance. We will continue to develop modern working practices that enable our people to work in the most effective and efficient way possible, in an appropriate working environment which optimises productivity and performance.

We continue to focus our efforts on developing our people through reward, performance and talent management processes. Working with the senior management team to understand the full complement of our internal and external training offering and how we can enhance the development of our people to reach their full potential.

We have offered full time permanent roles to three of our apprentices within Marketing, Finance and IT. We continue to train new apprentices, contributing to the UK government apprenticeship levy to fund new apprenticeships.



3.4. Plans for 2022-23

As we noted at the outset of this Communication on Progress, we have decided to focus our efforts this year on education and awareness raising across all four pillars of the UN Global Compact. In relation to Labour, our plans are that:

- Throughout 2022, we will put our hybrid working policy into action.
- Our ongoing work on performance and talent will result in the launch of a coaching provision for our staff, as well as taking advantage of internal mentoring from our most senior people
- We will continue to support our staff while they work from home, including through access to an Employee Assistance Programme where all staff can speak anonymously of any personal or professional issue that they are facing.



4. 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

4.1. Commitment

Risk Advisory is committed to the UN Global Compact's principles on the environment. As set out in our Environmental Policy, Risk Advisory undertakes to 'conduct its business operations in an environmentally friendly manner at all times'. Our Environmental Policy describes how we:

- Strive to continuously improve our environmental performance and integrate recognised applicable best practice into our business operations.
- Reduce our consumption of resources and improve efficiency in the use of these resources.
- Manage waste generated from our business operations according to the principles of reduction, reuse and recycling.
- Ensure environmental criteria are taken into account in the procurement of goods and services, wherever possible.









4.2. Policies and processes

Risk Advisory is predominantly an office-based consultancy and as such our greatest impact on the environment is generated through the running of our offices and staff travel.

Over 50% of Risk Advisory's staff are based in the London office. Historically therefore, our Environmental Policy has focused on mitigating our office waste there. Four areas on which we particularly focus our efforts are recycling, energy saving, purchasing and paper usage (see below).

Recycling	Energy saving
	
No waste from our London head office is sent to landfill. All recyclable waste is removed from site to be separated and recycled. General waste is removed from site and transported to a waste-to-energy plant to produce electricity and food waste is separated and recycled into biogas to produce renewable electricity and biofertiliser for farmland.	Risk Advisory insists that IT equipment is switched off at the end of each day to conserve energy where this is not done automatically. In some of our offices, our lights are controlled by motion sensors and therefore are only using energy when the office is staffed. Where motion sensors are not available, staff are required to turn off the lights at the end of the day. Wherever light fittings permit, energy saving light bulbs are used.
Where facilities are available, we operate the same recycling principles in all offices.	
.....	
Purchasing	Paper usage
	
Where possible, Risk Advisory purchases recycled and environmentally friendly goods including stationery, water and cleaning materials.	We strive to operate paperless offices to minimise the use of paper.

4.3. Activities

Over the past year, we have been largely working remotely due to the Covid-19 pandemic. This has meant that our emissions from travel, commuting and the running of our offices are still low compared with pre-pandemic levels. We expect a rise in our emissions this year as we are able to travel more freely and return to working from the office. Having said that, our new hybrid working policy means that most staff will only commute into the office a few times a week even once our return to the office is complete.

We also anticipate that our travel emissions will remain lower than previous years as our staff have adapted their working practices and expectations around face-to-face meetings have reduced as a result of the pandemic. Where travel is required we encourage staff to make the most of their trip by combining it with other activities that cannot be done remotely and have formalised this by adding an additional section to our internal travel request booking system. We hope that this will reduce the number of trips necessary and have the knock-on benefit of continuing to keep our carbon emissions low.



While working remotely it has proved challenging to create new initiatives to support our Environmental Policy. Instead we have focussed on raising awareness on environmental matters by promoting events such as Earth Day on our internal communication feed.

Additionally, in preparation for our return to the office, we have organised a coffee cup recycling bin to enable staff to recycle more of the harder to recycle materials.

4.4. Plans for 2022-2023

In the coming year we plan to continue to raise awareness amongst our staff of their environmental impact.

We have also begun using Xtonnes, a carbon emissions tracking app, to track our carbon footprint dating back to 2019. The data we have inputted for 2019 will additionally feed into a project, [Zero Carbon London Bridge](#), which will help our local area to develop a carbon strategy. We plan to use the app to track our carbon footprint this year and share the results with the business.



5. Anti-corruption

Principle 10:

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

5.1. Commitment

Risk Advisory is a global risk management consultancy which works with clients to manage a range of different risks, including those related to integrity. A core component of our work centres on supporting clients which are investigating allegations of corruption or bribery or conducting due diligence work to try to minimise those risks in new ventures and with new business partners.

Risk Advisory is actively committed to the fight against bribery and corruption. This commitment to do business with honesty and integrity is enshrined in our core values and is a theme that runs throughout the fabric of the business. Our specific commitment to work against corruption is expressed in our Ethical & Code of Conduct Policy which explicitly states that:

The Risk Advisory Group runs its business with integrity. Everyone must work together to ensure that they remain untainted by bribery or corruption ... We take a zero-tolerance approach to bribery.

Our commitment to eradicating bribery is set out in more detail in the Ethical & Code of Conduct Policy, which requires staff to operate within full compliance of the regulatory and legal framework in whichever country we operate. This includes compliance with the Bribery Act and other similar legislation, which outlaws the payment of kickbacks. These requirements are also reflected in our contracts with both clients and suppliers.

5.2. Policies and processes

To be a credible provider of integrity due diligence services, Risk Advisory has made sure that - like its clients - it has the systems and controls to eradicate the risk of bribery and corruption from its business.

In 2019, we updated our Ethical & Code of Conduct Policy, which all staff sign when they join the company. The policy provides staff with clear guidance on the standards of behaviour that are required by Risk Advisory.



To reinforce Risk Advisory's position on bribery and corruption, all new joiners attend a session with the Chief Risk & Compliance Officer about Ethics, which includes training regarding the risks or bribery and corruption and Risk Advisory's zero tolerance approach. Individual practices also run specific training sessions which focus on understanding the relevant legislation and include specific sessions on areas where we believe there is a particular vulnerability, like how to manage third parties.

5.3. Activities

5.3.1 Engagement with our clients

Risk Advisory is a global risk management consultancy committed to helping the world's most discerning organisations to manage their integrity, competitor and political and security risks.

Central to helping clients manage their integrity risk is the provision of our due diligence services. We work with clients across the globe to support their pre-transactional and periodic reviews of their business partners in support of their anti-bribery and -corruption compliance programmes. We also work closely with clients investigating allegations of wrongdoing made by whistleblowers or which emerge as a result of regulatory investigations.



5.3.2. Women in Compliance

Risk Advisory founded the Women in Compliance (WIC) networking group in London in 2009 to give women in the compliance and risk management fields the opportunity to network and build relationships with each other. WIC's LinkedIn group, where members are encouraged to share ideas and issues, as well as invites for a wide range of virtual networking events grew in 2020, with its membership passing 4,500.



Prior to the Covid-19 pandemic, the group hosted quarterly in-person events ranging from breakfast briefings, to International Women’s Day panels and has hosted a number of successful women in the legal and compliance fields as guest speakers. In 2020, the group’s events moved online as a result of restrictions on large gatherings, and therefore attracted a wider audience, including attendees from the US and Asia. Events in 2021 included discussions with Primark’s head of partnerships and capacity building in the ethical trade team at Primark and a conversation with Elizabeth Wilks-Wood, Vice President of Compliance at Carlsberg Group, who shared experiences in her compliance-focused career with the group.



5.4. Plans for 2022-2023

Our policies, procedures and training programmes are now well-established. We will keep them under review and seek to improve them over time. For the next 12 months, though, we will be devoting our energy to improving the knowledge of our employees about corruption and the impact it has on society.



Confidential

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