Control Risks

50 Fifty years of looking forward

Sustainability Report 2023–24

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Control Risks

CEO's statement of continued support for sustainability

This report provides us with an opportunity to reflect on Control Risks' commitment to sustainability as well as the services we provide our clients in related areas. It summarises our performance and key activities over the last financial year and sets clear goals for the year ahead.

A commitment to sustainability, which means incorporating social, environmental, economic and ethical factors into our strategic decision-making, is an imperative for the long-term success of Control Risks and for a sustainable future for the societies in which we work. We aim to provide our clients with the best support and advice in line with our commitment to responsible business.

Recognising the need to take a wide-lens view, in 2023 we appointed an independent sustainability consultant, ERM, to capture our broader corporate impact through a materiality assessment that examined the full spectrum of our activities and footprint. This review involved engaging internal and external stakeholders to identify priority sustainability issues for our business, and it has laid the groundwork for a refresh of our sustainability efforts as well as providing a focus for our sustainability reporting this year. The five focus areas for Control Risks, which have the greatest impact on our business, communities and the environment, as endorsed by our Board of directors, are:

- Business integrity and ethics
- Human rights and labour
- DE&I and social mobility
- Environmental sustainability
- Cyber and data protection.

Like our clients, we have weaved our commitments in these areas into our operational management, and they are built into our core values and the fabric of the firm. All of this is supported by appropriate governance structures. Our Board provides leadership at the highest corporate level to address and resolve sustainability challenges, and they are supported by the Sustainability Committee. The Sustainability Committee's mandate includes improving company policies to enforce sustainable practices, commissioning companywide initiatives to improve awareness and staff engagement, and overseeing the responsible implementation of our sustainability strategy. The members, who are all partners of our business, are Sally McNair Scott (Chair), Marcus D'Apice, Megan Karigambe, Amit Narayan, Christian Perlingiere, Jeremy Stimson and Adelene Seah and they meet quarterly.

In the past year, a growing number of our client conversations have included queries about our own approach to sustainability including encouragement for us to increase public disclosure of our sustainability approach and performance, as well as other aspects of corporate responsibility. As a result, the firm has completed a thorough assessment of its business sustainability practices through EcoVadis, the results of which can be found on our website. EcoVadis is a global leader for rating operational sustainability commitments, practices and performance. The assessment evaluates 21 sustainability criteria across four core themes: Environment, Labour & Human Rights, Ethics and Sustainable Procurement.

In part, these exchanges with clients respond to the widespread development of national and multinational legal and regulatory regimes related to human rights, business transparency and environmental sustainability. In our advice to our clients and our own practice, we emphasise that effective implementation of sustainability principles includes, but goes well beyond, the minimum requirements of regulatory compliance.

Control Risks works with a range of suppliers of goods and services, sub-contractors and other business partners, and we expect them to adhere to the same high standards, behaviours and cultural commitments that we ask of our own colleagues. In 2023 we launched a Third Party Code of Conduct to complement our Code of Ethics; we expect our Third Parties to abide by its principles in their work with us.

As a firm, we recognise that there is much more to be done and are committed to doing so. For myself, I look forward to working with our people, clients and other stakeholders to meet multiple sustainability challenges in the coming year.

Nick Allan
CEO, Control Risks

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Control Risks

About Control Risks

In a changing world, we make the difference.

Control Risks is a global specialist risk consultancy that helps to create secure, compliant and resilient organisations in an age of ever-changing risk. Combining unrivalled expertise, experience and reach with the power of data and technology, we provide the insight and intelligence needed to stay on track, realise opportunities and grow. Our headquarters is in London, and we have a network of international offices in every region and every time zone. In this report, we address the entire Control Risks Group.

At Control Risks, we understand risk, cut through uncertainty, and empower our clients to make better decisions. We keep opportunity moving forward and support organisations to benefit the communities and environments they work in. Through insight and experience, we help to mitigate threats, whatever form they take. In times of hope and times of crisis, we stand alongside our clients. When what matters most is on the line, we make the difference.

Control Risks

Structure of report

This report covers our financial year ending 31 March 2024. The five main sections address Control Risks' priority issues: business integrity and ethics, human rights and labour, DE&I and social mobility issues, environmental sustainability and cyber and data protection. Each of these contains five sub-sections:

Our commitment summarises the principles and requirements that guide our actions

Policy presents a summary of our policies in this core area

People and processes focuses on the practical implementation of these commitments 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

Plans for 2024–25 summarises our objectives for the year ahead

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Control Risks

Business integrity and ethics

Our commitment

The long-term sustainability of our business depends on our ability to maintain the highest standards of personal and collective integrity, often in difficult circumstances. This means that:

› Our advice to clients will always be objective and provided with the utmost care to avoid bias, including national, political and cultural bias.

› We will tell them the truth, however unpalatable it may be.

› In turn, Control Risks will never compromise on its own commitment to act ethically and with integrity.

› In our work with our clients, and in the management of our own business, we place particular emphasis on anti-corruption.

Policy

Code of Ethics

Our Code of Ethics is published on the Corporate Responsibility section of our external website. It affirms our core values: integrity and ethics; collaboration and teamwork; commitment to people; and professionalism and excellence. The Code was reviewed most recently in May 2024, with minor adjustments to the structure and headings.

The Code states that Control Risks' employees must at a minimum comply with all applicable national and international laws and regulations wherever we work. However, our ethical commitments go beyond a narrow reading of legal compliance. This document then sets out the principles according to which Control Risks operates. These include:

› **Clients.** We believe that considered risk-taking is an essential pre-requisite for our clients' success. We help put in place the necessary measures to enable our clients to fulfil their responsibilities to safeguard their organisations, their environmental, social and governance commitments, and give them a secure foundation on which to grow.

› **Business integrity.** Control Risks does not pay bribes directly or indirectly and does not engage in any acts of corruption including the facilitation of tax evasion.

› **Human rights.** Control Risks respects the full range of human rights (see Human Rights and Labour section on page 8).

› **Environmental sustainability.** Control Risks recognises the need to embed all aspects of environmental sustainability across our business. (See Environmental Sustainability section on page 14).

› **Conflicts of interest.** Control Risks' employees must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict with those of Control Risks.

› **Confidentiality.** Control Risks will never disclose its work for a particular client without their consent, unless legally required to do so.

› **Political activities.** As a corporate body, Control Risks has a policy of strict political neutrality: we do not make donations to any political parties, organisations, or individuals engaged in politics.

Anti-Bribery and Anti-Corruption Policy

We elaborate on our Business Integrity commitments in our Anti-Bribery and Anti-Corruption Policy, which is also available on our external 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.

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Control Risks

Business integrity and ethics

People and processes

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 labour and human rights issues. 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 2023-2024, 16 cases were referred formally to the Ethics Committee (compared with 12 for the 2022 calendar year and nine in 2021). Cases ranged from Europe to Middle East, South-East Asia and the Americas. Most of these cases related to potential new assignments and the committee works closely with our consultants to ensure that these meet our high ethical standards. The increase in the number of cases reflects the diversity of our international business rather than any specific trend.

Internal whistleblowing procedures

We encourage employees who wish to raise ethical 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.

In the year under review, we received six whistleblowing calls. In two cases, the people making the reports revealed their names, while the others were anonymous. All of the reports related to personnel issues, for example complaints by employees against their managers, and we referred them to our human resources teams.

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.

Our Third Party Grievance Policy states that we are always ready to listen to anyone outside the company who wishes to express a grievance relating to our ethical conduct. This grievance process is placed prominently on our external website in 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 two external complaints via the international website.

Training

Internal anti-corruption training and raising awareness
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.

Promoting engagement with our policies
To encourage colleagues to see our policies in the context of a practical example, we periodically circulate "dilemma scenarios" by email. Colleagues are asked to consider the scenario and vote on suggested actions or responses.

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 vendors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own." We reinforce this point by requiring all third parties to confirm their compliance with our Third Party Code.

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 internal risk and audit functions 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".

Control Risks

Business integrity and ethics

External engagement

Engagement with our clients

Our most important external engagement is with our clients: we regard anti-corruption and financial controls as an essential ingredient of the 'G' in the Environment, Social, Governance (ESG) agenda. Our work ranges from integrity due diligence and risk analysis to policy development, training and complex problem solving. We have particular expertise in helping international companies apply global principles in complex operating environments in emerging economies.

Examples of our work in the business integrity arena include:

- Working with our clients to help them formulate codes, policies and standard operating procedures that are tailored to their particular sectors and organisational requirements. A recent example has been a project for a start-up company working on renewables in Southeast Asia.

- Conducting risk assessments that are specific to each client's business model, commercial sector and geographical region. A recent example was a global anti-corruption review for an architectural products company following its acquisition by a leading international investor.

- Reviewing and where necessary stress testing anti-bribery and anti-corruption programmes to ensure that they are functioning effectively. We typically combine a range of techniques, including interviews with frontline personnel as well as middle and senior managers, together with transaction testing.

- Designing both e-learning and face-to-face training programmes. In our experience, e-learning works well for general awareness-raising. However, we favour face-to-face training for senior managers and teams that that by the nature of their work are more exposed to integrity risks. We make extensive use of scenarios and case studies drawn from real-life experience.

- Investigating and working with our clients to resolve problems, for example in response to whistleblowers' complaints. The problems that arise are extremely diverse: they may range from allegations of personal misconduct in senior management to advice on how to respond to external demands for bribes that amount to a form of extortion.

Plans for 2024–25
In the coming year we will:

- Pilot a new set of training modules on ethics and business integrity for consultants in the Asia-Pacific region and, drawing on the lessons learnt, share them with other regions

- Continue to communicate corporate policy on a regular basis

- Promote the role of the Ethics Committee and refresh/review the committee's Terms of Reference and membership as needed.

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Control Risks

Human rights and labour

Our commitment

Respect for human rights is a core Control Risks value. It is especially important for us because much of our work involves helping our clients work ethically and successfully in complex social and political environments with poor governance standards. This means that:

- We assess the human rights impacts of our own activities before taking on new projects and throughout our engagements.

- We incorporate human rights principles into the advice that we give to clients.

- We place particular importance on promoting high standards in the field of security and human rights.

- We assess the risks of labour and human rights violations in our supply chain and take steps to mitigate them.

- We seek to maximise the lessons of experience in a spirit of constant improvement.

Policy

We express our commitment through the following policy statements.

Code of Ethics

Our Code of Ethics affirms our respect for the full range of human rights and makes explicit reference to the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the International Labour Organisation (ILO) core conventions.

Third Party Code of Conduct

Our Code of Conduct makes clear that we expect our vendors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own, including with regard to human rights. We summarise our expectations in our Third Party Code of Conduct. If a third party fails to follow this code, we will in the first instance look for corrective action but if that is not feasible we reserve the right to terminate the business relationship subject to the applicable contract.

Human Rights Policy

Our Human Rights Policy is our most detailed statement on the full range of our human rights commitments. It includes sections on how we treat our employees, working with clients, assessing human rights risks linked to our work, working with government agencies, working with vendors, and relationships with communities.

The policy also contains sections on how to raise concerns, responding to external grievances and employee responsibilities.

The policy was most recently updated and reviewed in May 2024. The updates include a clarification to confirm that Control Risks would not prevent its people from joining a trade union.

Modern Slavery

Our Human Rights Policy states that Control Risks has zero tolerance for all forms of modern slavery, including child labour and human trafficking. We are committed to implementing effective systems and controls to ensure that none of these practices are occurring anywhere in our supply chains.

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.

Supplier Management Policy

Our Supplier Management Policy builds on our Human Rights Policy, focusing on how to implement its principles in our supplier relationships, including with reference to modern slavery risks. It states that the selection and management of suppliers must "minimise the risk of illegal, unethical or unprofessional behaviour" and specifically "where a supplier provides personnel to Control Risks it should have ethical employment practices" (see the Due Diligence for Suppliers of Personnel on page 09).

Client and Project Risk Management Policy

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 will continue to monitor potential human rights risks throughout the duration of the assignment.

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Control Risks

Human rights and labour

People and processes

Human Rights and Labour Subcommittee

At the group level our Sustainability Committee, which is made up of Control Risks Partners from a range of regions and commercial practices, coordinates our sustainability initiatives across a range of inter-related portfolios, including human rights. In February 2024, we set up a new Human Rights and Labour Subcommittee under the sponsorship of a partner from our High Risk Managed Services (HRMS) division in the Middle East. The Subcommittee's mandate is to work with colleagues across the business to reinforce our approach to human rights with a particular focus on risk assessment and training. We have now built up an international and cross-disciplinary team to serve as 'champions' within their respective regions and service lines. In the coming year, we plan to coordinate a series of projects with a view to raising awareness and building capacity across the Control Risks' international network.

The Subcommittee's first project relates to the intersection between security and labour welfare. In 2023 the International Code of Conduct Association (ICOCA – see below) published a report highlighting abusive labour practices in the security sector at a global level, particularly in developing economies. Our own recruiting practices are rigorous in the few high-risk countries – notably Iraq – where we recruit security guards directly. However, inspired by the ICOCA report, we want to make sure that we are truly best-in-class and we are therefore developing an in-house risk assessment and auditing methodology that we will use in Iraq and other high-risk countries. This methodology is primarily intended for internal use but it will also inform our work with clients.

Risk assessment

Country and project risk

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-specific 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. These committees meet at least quarterly.

Labour welfare

The majority of our direct employees are trained professionals with specific skillsets and qualifications, meaning the issue of forced or child labour does not arise in our own operations. However, we are alert to the potential for modern slavery risks associated with services provided by our suppliers. We pay particular attention to the risk that providers of services, such as office cleaners, might employ migrant or otherwise disadvantaged workers who may be more vulnerable to exploitation and poor worker welfare conditions.

Due diligence for suppliers of personnel

In line with this assessment, our Supplier Management Policy requires suppliers of personnel to explain their own recruitment and employment practices via a questionnaire at the selection stage. This process was developed by our own subject matter specialists and is tailored to our business. It covers, for example, whether workers pay fees as part of their recruitment process, the payment of sick leave or overtime, and the availability of grievance mechanisms. We emphasise that employees should discuss any concerns with their managers as part of these vetting procedures.

Training

We have an online human rights training course which is mandatory for all senior employees in internal corporate functions, as well as all members of the following teams: Crisis and Security Consulting; Business Intelligence; Discovery + Data Insights; Global Risk Analysis; Response; and Cyber Security. It is a formal requirement to take this course every two years, most recently in July 2024.

The course was designed by a Control Risks in-house team and 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.

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. We provide similar training to security consultants working elsewhere in our (HRMS) practice as we move into new regions, notably Ukraine and Guyana.

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Control Risks

Human rights and labour

External engagement with clients – managing human rights and labour risks

In the field of human rights, many of our most important contributions relate to the services that we provide for our clients.

Our Global Risk Analysis team reports on human rights issues as part of our regular reporting in our online services as well as in bespoke reports for individual clients. At the policy level, our analysis covers the implications of new regulation such as the European Union's new Corporate Sustainability Due Diligence Directive (CSDD). At the country level we advise on the human rights implications of continued engagement with high-risk jurisdictions such as Myanmar. A recent theme has been the complex and often contradictory ethical requirements that apply in cases where companies have established operations in such jurisdictions and wish to withdraw.

Similarly, our Business Intelligence teams regularly address companies' human rights records as part of their corporate due diligence assessments. A recent example for which we used an extensive network of local sources, included an assessment of the human rights record of a mining operation in Southern Africa. Similarly, we include modern slavery and labour rights among the ESG issues covered in our VANTAGE third-party due diligence practice.

We have recently been engaged by a leading development finance institution to provide guidance and support to its own specialists as well as its clients operating in fragile states and conflict-affected environments. The assignment has a particular focus on managing and mitigating human risks and impacts associated with the use of security forces. The services that we provide range from basic consultation and support to on-the-ground project assessments, potentially extending to crisis response.

In another example of our consultancy services, we recently provided an international mining company operating in West Africa with a human rights benchmarking report together with a roadmap for incremental improvements over a three-year time period. Our recommendations covered governance and policies, training, partnerships and initiatives supply chain due diligence, the Voluntary Principles on Security and Human Rights, monitoring and communications.

In the Middle East we continue to provide labour welfare risk and management advice. Recent examples include a modern slavery risk assessment of one of the region's largest and most complex construction projects. The report concluded with a detailed set of recommendations, including with regard to policy and risk mitigation and access to remedy.

Promotion of professional standard 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 International Code of Conduct for Private Security Providers (2010). Control Risks was a founder member of the association, and we take satisfaction from its expansion in numbers and in influence. It now has some 170 member companies and affiliates, with a growing focus on attracting participation from the Global South. We regularly participate in ICOCA events, including its annual general meetings in Geneva each December.

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 more than 50 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. The group's leadership works closely with ICOCA, including on human rights issues. Control Risks Director Richard Wylde was chairman of SCEG from 2021 to the end of 2024.

Thought Leadership

In April 2024 Control Risks partner Nabi Abdullaev contributed to a podcast by the Institute for Human Rights and Business titled How should companies respond to snap military drafts? The discussion compared the experiences of companies seeking to protect their employees in response to military conscription demands in Russia and Myanmar.

We pay close attention to the activities of the UN Human Rights Council's Working Group on Business and Human Rights. In December 2023, a Control Risks representative participated in one of the Asian consultation sessions which contributed to the thinking behind the group's May 2024 report on Investors, environmental and social governance approaches and human rights.

Plans for 2024–25
In the year ahead, we plan to:

❯ Consolidate and expand our network of internal human rights "champions" through the Human Rights and Labour Subcommittee;

❯ Complete the pilot methodology/framework for modern slavery risk assessment in relation to the recruitment of guards in Iraq, and extend it to other regions;

❯ Communicate corporate policy on a regular basis and promote the use of Speak Up (our Whistleblowing facility) for employees and subcontractors.

❯ Develop new training frameworks for specific target audiences within Control Risks.

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Control Risks

› Diversity, equity and inclusion

Our commitment

Control Risks wants to attract the best people with the best ideas, regardless of social or ethnic background, religious belief, gender identity, sexual orientation, or disability. We actively promote the principles of Diversity, Equity and Inclusion across our global network. This means that:

› We consistently review and update our policies and processes to ensure employees succeed based on nothing other than their talent, behaviour, work ethic and dedication to our firm and clients.

› Our recruitment practices support the hiring of people that are representative of the societies in which we are based.

› We support learning and development across the firm ensuring access to opportunities are equitable for all.

› We strive to create an environment where all our people feel included and belong.

Policy

Diversity, Equity and Inclusion Policy

In accordance with our values and "One Firm" principle, our Diversity, Equity and Inclusion Policy sets out our commitment to provide an inclusive working environment and to promote a culture that values Diversity and Equity, in which employees can realise their full potential and contribute to the success of the business.

Our website illustrates how we aim to deliver on this commitment by promoting Diversity and Equity in employment practices and establishing principles in attraction and recruitment, selection, engagement, development, training, reward and retention.

Code of Ethics

Our Code of Ethics states that:

› Control Risks is committed to building an inclusive workplace, which gives equal opportunities to all, regardless of a person's race, ethnicity, gender, gender identity and expression, sexual orientation, neurodiversity and 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.

Behaviour and Dignity at Work Policy

In the policy we explain how Control Risks will deliver on its commitments by establishing standards of behaviour our people are required to adhere to in their interactions with each other and with third parties. This includes an expectation that all employees:

› 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.

We have systems in place in this policy and our Grievance Policy to ensure that any issues relating to discrimination, bullying or harassment are dealt with fairly and objectively.

Our culture and values

Our values are integral to who we are and what we stand for. Each of us at Control Risks embrace the following core values that are the foundation of our business:

› Integrity and ethics

› Collaboration and teamwork

› Commitment to people

› Professionalism and excellence.

Control Risks has a highly inclusive culture that enables all our employees to be and bring their authentic selves to work if they choose to. We believe our core values allow us to do this and that diversity powers innovation and both personal and company growth.

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Control Risks

Diversity, equity and inclusion

People and process

We have identified four aims for our commitment to Diversity, Equity and Inclusion. These are:

> To be a meritocracy

> To be representative of the societies in which we are based

> To increase the proportion of senior leaders from underrepresented groups

> For people to feel included and feel they belong

We aim to make progress against these aims by identifying changes to our policies and processes, and through communication and engagement with all of our employees. Some of our achievements over the last financial year are illustrated below

To be a meritocracy

> We have implemented a global exit interview process to capture and report on feedback from employees when they leave the firm. Questions relate to practices around how people grow, develop, and succeed at Control Risks.

> Line Manager guides have been produced to ensure performance is managed in a meritocratic way.

To be representative of the societies in which we are based

> We run an Africa Graduate Scheme, which was launched in 2023. We are delighted that three more graduates completed the scheme in March 2024.

> Diverse candidate profiles are displayed on the Control Risks website.

> We launched a diversity, equity and inclusion page in Japanese on our Japanese website to provide better reach to our Japanese market.

To increase the proportion of senior leaders from underrepresented groups

> Language decoders are used for job advertisements to ensure they are gender neutral and attract diverse talent. We have also added diversity statements to encourage underrepresented candidates to apply and reassure them that they will face a fair assessment.

> Recruitment processes in our HRMS business, have been amended. We have introduced the use of personal statements and presentations in the selection process and provided interview training and advice for internal applicants.

For people to feel included and feel they belong

> We have introduced a global sabbatical policy to offer our employees some flexibility and a greater work life balance.

> We are trialing a scheme which allows colleagues to flex their public holidays so they can choose days of cultural and religious significance as opposed to mandated days.

> We check in with new joiners to ensure they have what they need to perform at their best with respect to workplace accessibility and flexibility (tools, equipment or any other adjustments to support them in their role).

> We are providing employees with resolution training to help them raise issues when their environment is not making them feel included.

> There is an inclusive events guide to ensure company events are welcoming for all our employees no matter their age, culture or background. The guide addresses issues such as event timings, dietary considerations, sustainability, accessibility and hybrid working.

> We have hosted a series of events to raise awareness and understanding around diversity issues, these included: a fireside chat in Asia Pacific between two employees raising autistic children; market specific events in the Americas to promote diversity; and using our internal platforms and newsletters to share stories around cultural and religious days of celebration and activities and initiatives taking place in the regions.

> We carried out an employee engagement survey to hear how our employees feel we are progressing against these aims.

Our people networks

Our three People Networks (Mosaic, the Women's Network and Synergy) continue to run a range of educational events and champion important issues. Mosaic supports LGBT+ employees. The Women's Network is an inclusive group working to ensure that Control Risks is a compelling work environment, attracting, progressing and retaining talent regardless of gender. Synergy promotes and celebrates ethnic diversity.

In 2023-2024 initiatives included:

Mosaic

> Formulation of the new Executive Committee and creation of the global strategy

> Global training delivered on the ABC of sexual diversity

> Various PRIDE events around the globe in our regional offices in June 2023.

Women's network

> Creation of the Women's Network Charter

> Global training for the network on projecting credibility and negotiation skills

> Local events such as celebrating the women's world cup, lunch and learns, networking events and volunteering

> Celebration of International Women's Day with events across all offices globally.

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Control Risks

Diversity, equity and inclusion

Synergy
> Mentoring circle with our Global CEO, Nicholas Allan
> Launch of bi-annual newsletter.

All our diversity, equity and inclusion groups feed in ideas and perspectives, support the implementation of global projects and work to raise awareness across the business.

External engagement

This year a variety of Control Risks' practice areas, across our global operations, have partnered with clients to help them achieve their diversity, equity and inclusion goals.

For instance, we provided a global tech company with a threat assessment on a UK research institute, focusing on ethical and social issues arising from their work. This included a DE&I-focused assessment pertaining to the areas of discrimination, harassment, workplace diversity, equity and inclusion.

Control Risks supported the venture capital arm of a large institutional investor with assessments of the corporate culture and governance standards of several European early-stage technology investments. Our client wanted to understand the perspective of employees of these organisations towards the behaviours and leadership of the executive teams.

An international company, seeking to outsource the provision of security consultants for its operations, specifically focused on the potential provider's ability to deploy consultants from diverse populations. When this contract was awarded to Control Risks, the client emphasised the importance they had placed on this during their decision.

A private equity firm wanting to engage our services, made it a requirement that 25 percent of the project team must be represented by female associates.

An international company, seeking to fulfil its duty of care towards its local staff of predominantly women, requested we provide a regular security briefings on key crime trends in South Africa as well as defensive driver training. In doing so, the client requested we provide a female consultant to deliver security briefings as well as female driving instructors. These service offerings continue to be well received as they focus on specific risks affecting women in a South African context.

We carried out a complex multi-faceted investigation into alleged internal misconduct for a client organisation. Our investigation and guidance enabled the client to address the root cause of the issues, improve the reporting and whistleblowing protocols and enhance the safety and wellbeing of employees across their multiple project sites.

A client requested us to provide Personal Security Awareness Training (PSAT) for their local female staff. This led to our development of a bespoke course tailored for women living and working in South Africa. This course was well received and exclusively delivered by our female consultant/s.

We have also volunteered our time to support the communities in which we operate in, for instance, speaking at women in leadership forums for university students and STEM career events in schools.

Plans for 2024−25
In the year ahead, we plan to:

> Launch a mentoring platform to connect mentors with mentees on a broad range of topics ranging from technical skills to DE&I such as female leadership, parenting, and coming out in the workplace.

> Improve transparency of our people management processes through creation of a career framework outlining the technical capabilities required at each level which is consistent across the consulting practices to transparently calibrate promotions and support development for all our employees.

> Launch a graduate scheme in Saudi Arabia and Iraq to build skills in the local market that are not readily available to meet our growth plans.

> Launch DE&I Leadership training in HRMS to equip managers with tools for excellence in emotional intelligence, DE&I and handling difficult conversations with a view to extend this globally.

> Utilise a list of diverse recruitment channels that was collated during the financial year 2023−24 to reach a more diverse pool of candidates. Some of these channels include specific groups which are focused on providing career opportunities to underrepresented groups.

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Control Risks

Environmental sustainability

Our commitment

Control Risks is committed to playing its part in environmental sustainability and reducing greenhouse gas emissions. This means that we will:

▶ Continue to measure our GHG emissions on an annual basis and set short-term goals for reduction

▶ Meet all applicable regulatory requirements regarding environmental disclosures and compliance across all countries where we work, as well as increase transparency through voluntary disclosures including in line with the CDP (formerly the Carbon Disclosure Project), EcoVadis and the United Nations Global Compact (UNGC)

▶ Embed sustainability through our procurement practices, operation of our vehicles, smart travel and focus on waste

▶ Transition to a modern office network, with sustainability standards in design and operation, when there is the opportunity to do so.

Policy

Code of Ethics

Our Code of Ethics includes a clear statement that we recognise the need to embed all aspects of environmental sustainability across our business and will conduct business in a manner that is considerate of our impact on the planet, the communities where we work and our stakeholders.

Environment Policy

Our Environment Policy forms the foundation of environmental improvements for our business. It sets our environmental objectives, including our commitment to achieve net zero carbon emissions, and informs our people about their environmental roles and responsibilities. Our emissions reduction strategy focuses on:

▶ **Management and operation of our vehicle fleet** in an environmentally responsible manner. Control Risks operates a vehicle fleet in extreme environments (such as locations with severe temperatures, active conflict zones, and poor availability of quality fuels). The safety, security and reliability of all vehicles will always remain a priority. However, there are ways we can limit emissions without compromising on these issues such as by investing in fuel-efficient vehicles, regularly maintaining the vehicles, training and educating our drivers on fuel-efficient driving techniques and utilising routes which reduce unnecessary fuel consumption.

▶ **Reducing workplace waste** by cutting consumption and reusing and recycling office materials whenever possible.

▶ **Responsible business travel** by considering whether travel is necessary and whether there are options for journeys other than air travel.

▶ **Managing our supplier and contractor relationships.** In this context, Control Risks briefs its suppliers and contractors on its environmental commitments through its Third-Party Code of Conduct.

▶ **Greener offices and other sites.** This is applied through the completion of a green office selection checklist prior to signing a lease, which measures the impact of the selection of office space and other premises against environmental sustainability factors helping us to select greener and more sustainable premises.

People and processes

A member of the Executive Committee and the Board, champions environmental management within the company through the Sustainability Committee. As previously mentioned, the committee is a key body in the firm's governance that impacts its corporate responsibility and is comprised of colleagues across locations and service lines. Its mandate includes implementing the process of calculating our global GHG emissions.

Our emissions calculations are included in our group annual report, which includes a separate disclosure for our UK operations to meet the UK government policy on streamlined energy and carbon reporting (SECR) requirements for large unquoted companies. Compliance with environmental legal and regulatory requirements is included in our internal audit process.

An e-learning module titled Health, Safety and Environmental is part of our global induction programme and this mandatory training is repeated every two years. The training includes a module on environmental sustainability and how employees as part of this training.

The sustainability page on our intranet keeps our people informed about the steps we have taken towards meeting our policy objectives and lets them know how they can play a part in environmental initiatives at Control Risks.

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Control Risks

Environmental sustainability

### Shrinking our greenhouse gas (GHG) output

Measuring and reporting our carbon footprint is essential in assessing progress and directing future effort. Client requests for information on our environmental performance are increasing year on year with pitches, relationship reports and scorecards on sustainability rating platforms requiring full disclosure of our environmental performance.

In the reporting period we established our Scopes 1, 2 and 3 GHG emissions inventory across our 45 offices and global operations. In line with internationally accepted methodologies, the GHG inventory was based on the Greenhouse Gas Protocol corporate accounting and reporting standard established by the World Business Council for Sustainable Development and the World Resources Institute.

The results of the exercise showed that Control Risks' GHG inventory, including Scopes 1, 2 and 3 emissions, covering all Control Risks sites between 1 April 2023 and 31 March 2024, totalled 25,762 tCO$_2$e[1] (made up of 13,422 tCO$_2$e (for high-risk protective services, which operate a fleet of over 500 armoured vehicles) and 12,340 tCO$_2$e (for all other services)). To put its total emissions in context, Control Risks looked at its emission intensity based on its annual revenue during the period and carried out a limited comparison against peer organisations across Control Risks related service areas. This revealed that Control Risks was doing better than some of its peers but had lessons to learn from others. Key sources of Scope 1 GHG emissions include vehicle fleet, diesel generators, refrigerant top-ups, and natural gas for heating. Scope 2 GHG emissions result from office electricity consumption and Scope 3 emissions result largely from business travel and the use of purchased goods and services.

[1] tco$_2$e stands for tonnes (t) of carbon dioxide (CO2) equivalent (e). "Carbon dioxide equivalent" is a standard unit for counting greenhouse gas (GHG) emissions regardless of whether they're from carbon dioxide or another gas, such as methane.

GHG emissions by scope (12 months to 31 March 2024)

GHG emissions (tCO$_2$e)

20,000	
15,000	
10,000	
5,000	
0	
	Scope 1 Scope 2 Scope 3
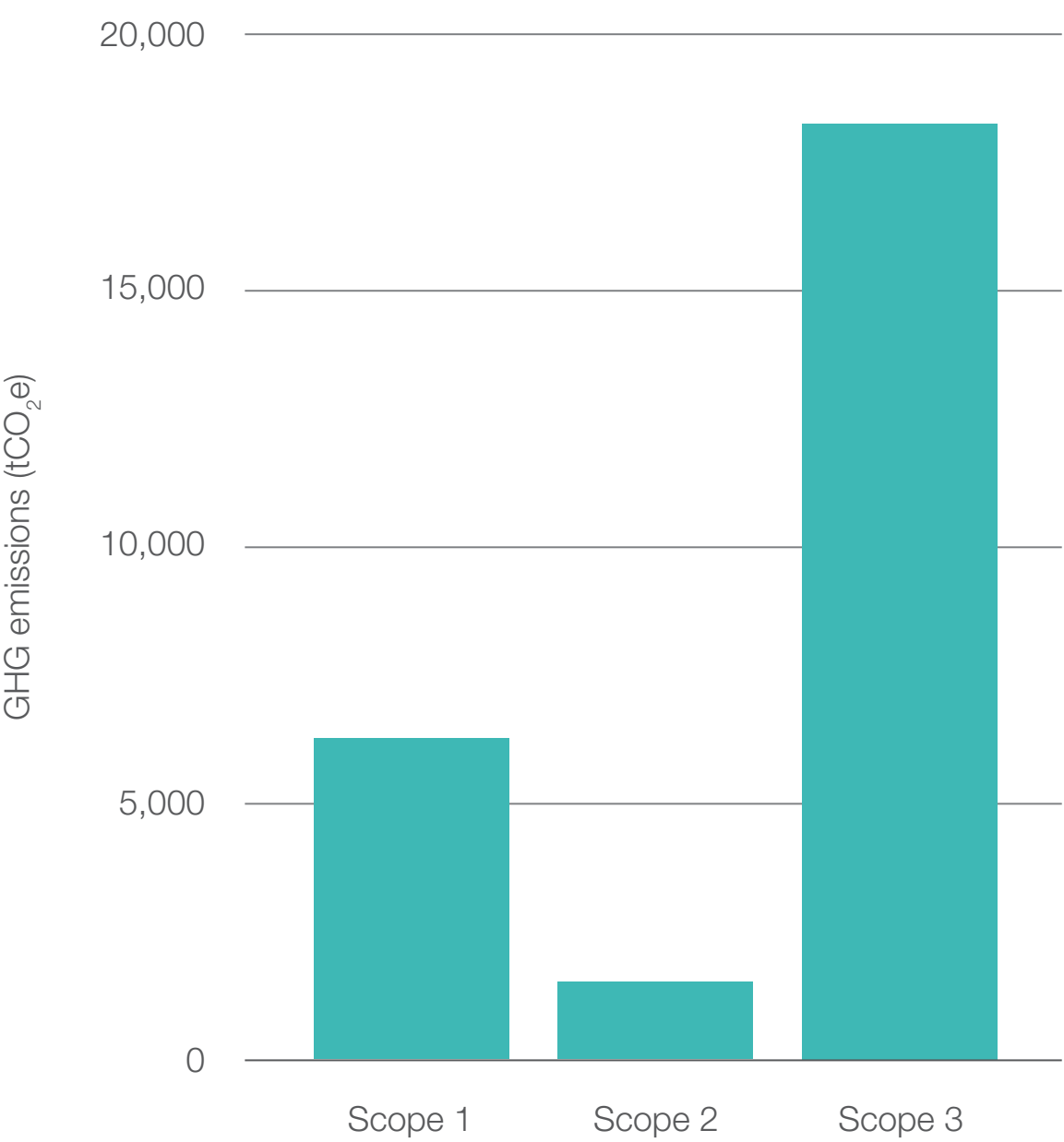
Net-zero emissions

As mentioned, our Environment Policy confirms our target to become a net-zero emissions business by 2050. We are making progress. By 31 March 2024, we had reduced our carbon emissions from our operations by 3% compared with our financial year 2023 on a net basis.

CDP

Control Risks has participated in the CDP (formerly the Carbon Disclosure Project) global environmental disclosure programme for a number of years by volunteering environmental and climate change data through an annual reporting process. This is one of the ways in which Control Risks strives to be transparent about its environmental impact and prepares for the future.

External engagement

Our work with clients

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

Regulatory analysis

By conducting ESG policy reviews, we have also supported clients in mapping potential gaps in their plans for environmental impact mitigation, based on best practices and on recognised standards including the Sustainable Development Goals and the Sustainability Accounting Standards Board. This has provided them with the local, sector-specific insights they needed to make informed investment and risk management decisions. In early 2024, we produced a geopolitical and ESG risk assessment for a major oil and gas producer in southern Africa. Alongside providing our client with a thorough report on key current and future risks to their business, we outlined the associated threats and triggers, including upcoming changes to the political and regulatory landscape. By collaborating closely with a range of cross-functional teams within the client's business, we were able to provide a clear set of mitigation measures that the client could implement rapidly and effectively, focusing largely on their environmental impact and political exposure.

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Control Risks

Environmental sustainability

Crisis management consulting

Control Risks has built its professional reputation on providing the best crisis and incident readiness, response and recovery services to clients around the world, including with regard to environmental crises and natural disasters. Our consultants help industries become more resilient by enhancing crisis management plans and protocols. We 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. We include environmental elements in many of our exercises and workshops. For example, we rehearse our clients' decision making, recording and accountability against the backdrop of environmental crises and natural disasters such as hurricanes, earthquakes and tsunamis.

Greenhouse gas consulting

We have made progress in supporting our customers in reducing their own emissions across their own operations and value chains. In 2023, we supported a North American city council in developing action plans to manage their environmental impact as they prepared to host a large-scale sporting event. We worked with our client to identify initiatives that would lower their energy consumption and associated GHG emissions, as well as reducing waste generated by visitors and supporting the development of new and expanded green spaces.

In the past year we have also helped multiple investors identify, understand and assess risks related to environmental protections and greenhouse gas emissions. We worked with our client, a leading private equity firm, to develop a bespoke risk assessment tool to support our client's due diligence processes in the pre-investment phase, as well as identify concentrations of risk across their portfolio. Our approach focused on environmental risks, including GHG emissions, waste management, and energy usage, with our findings enabling our client to implement relevant policies and processes for high-risk investments.

We have supported clients throughout the entire Net Zero process, from quantifying and understanding their GHG emissions, setting Science-Based Targets, establishing a Net Zero strategy, and purchasing offsets. We have been closely following developments in the global regulatory and voluntary carbon markets, allowing us to support clients in selecting high-quality carbon offsets and remain compliant with carbon markets. In late 2023, we worked with a major energy producer in Central America to review their carbon offset project selections against a range of technical criteria (such as baseline selection and co-benefits), enabling them to make informed and risk-aware decisions about the reputation and effectiveness of their investments, and continue working towards reducing their global emissions.

Volunteering

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.

We have supported environmental cleanups in different locations around the world including in conjunction with Thames21 to help remove plastic waste from our iconic river's shoreline around Battersea Bridge Southside and at East Coast Park, a well-known beach front in Singapore.

Our contributions helped to reduce waste and directly benefit wildlife and the ecosystem. It also aided valuable research into plastic pollution and education about its far-reaching consequences.

Plans for 2024–25
In 2024–25, we will focus on the following key activities:

❯ Raise awareness about our new environmental policy and engage with business units to implement and address challenges

❯ Continue to calculate our carbon footprint and set short-term goals for improvement

❯ Review carbon offset options and consider setting an investment budget.

Cyber and data protection

Our commitment

Control Risks exists to support our clients in all aspects of security, including cyber and data protection. Safeguarding data and ensuring robust cybersecurity measures are central to our purpose of delivering the best possible consultancy services. By embedding these commitments into our daily operations, we aim to inspire trust and confidence among our clients, employees and broader stakeholders.

This means that:

- We maintain our ISO 27001 certification and align with the NIST Cyber Security Framework to ensure we follow leading global standards for maintaining and safeguarding information.

- We perform ongoing risk assessments to proactively identify and address potential threats, ensuring we stay ahead of emerging risks and minimise any impact on our clients and stakeholders.

- We handle all client data with the utmost care, following a strict Data Protection Policy that complies with international standards such as GDPR and securely manages the lifecycle of data.

- We oversee cybersecurity and data protection at the highest levels of our leadership, with our Information Security Forum and Risk Committee quarterly to align objectives, allocate resources and drive continuous improvement.

Policy

Our cybersecurity and data protection framework is anchored by a comprehensive suite of policies, standards, guidelines, and best practices. These are designed to manage cyber risk across the organisation effectively. By aligning with international standards such as ISO 27001 and the **NIST Cyber Security Framework**, we ensure our policies meet industry benchmarks for information security.

Information Security Policy

Our Information Security Policy serves as the cornerstone of our security framework. It establishes the overall direction and support for information security in accordance with business requirements and relevant laws and regulations. The policy aims to:

- **Protect Confidentiality, Integrity, and Availability**: By safeguarding all forms of information, whether digital or physical, against unauthorised access, alteration, or destruction.

- **Define Security Responsibilities**: By outlining the roles and responsibilities of all employees, ensuring everyone understands their part in maintaining security.

- **Support Business Objectives**: By aligning security measures with organisational goals to facilitate smooth and secure operations.

- **Ensure Legal and Regulatory Compliance**: By adhering to all applicable laws, regulations, and contractual obligations related to information security.

Acceptable Use of ICT Policy

The Acceptable Use of Information and Communication Technology (ICT) Policy provides clear guidelines on the appropriate use of Control Risks' technological resources. Its objectives are to:

- **Prevent Misuse of Resources**: Prohibit activities that could harm system integrity, such as introducing malware or engaging in unauthorised access.

- **Promote Responsible Use**: Encourage employees to use ICT resources ethically and efficiently for legitimate business purposes.

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Control**Risks**

Cyber and data protection

❯ **Protect Sensitive Information**: Ensure that company data is handled properly to prevent data leaks or breaches.

❯ **Enhance Security Awareness**: Educate users about potential risks associated with ICT misuse.

Clear Desk and Screen Policy

Our Clear Desk and Screen Policy is designed to reduce the risk of security breaches in the physical workspace. The policy focuses on:

❯ **Protecting Sensitive Information**: Mandate that all confidential documents are securely stored when not in use and that computer screens are locked when unattended.

❯ **Reducing Insider Threats**: Minimise the chance of unauthorised personnel accessing sensitive data.

❯ **Promoting a Security-Conscious Culture**: Encourage employees to maintain an organised workspace that reflects our commitment to security.

❯ **Supporting Compliance Efforts**: Aid in meeting regulatory requirements related to physical security and data protection.

Data Protection Policy

The Data Protection Policy outlines our commitment to handling personal and sensitive data responsibly and in compliance with international data protection laws, such as GDPR, CCPA, LGPD, PIPL and others relevant to our operating jurisdictions. The policy aims to:

❯ **Ensure Lawful Processing**: Collect and process personal data transparently and lawfully for legitimate purposes.

❯ **Protect Individual Rights**: Respect and uphold the data privacy rights of individuals, including access, correction, and deletion of their data.

❯ **Implement Security Measures**: Apply appropriate technical and organisational measures to safeguard personal data against loss, theft, or unauthorised access.

❯ **Manage Data Lifecycle**: Establish procedures for data retention and secure disposal when data is no longer needed.

Policy Approval and Dissemination

All policies at Control Risks are approved at the executive level, demonstrating top-level commitment to cybersecurity and data protection. To ensure global consistency and compliance:

❯ **Global Dissemination**: Policies are communicated across all regions where we operate, ensuring every employee understands the standards expected of them.

❯ **Employee Induction**: New hires receive thorough training on these policies during their induction process, embedding security awareness from the outset.

❯ **Annual Refreshers**: At least annually, we reinforce these policies through mandatory training sessions, updates, and communications to keep security top-of-mind.

❯ **Accessibility**: Policies are readily accessible to all employees via our intranet and are reviewed regularly to incorporate the latest best practices and regulatory changes.

Alignment with International Standards

By aligning our policies with ISO 27001 and the NIST Cyber Security Framework, we ensure that our approach to cybersecurity and data protection is systematic, risk-based, and internationally recognised. This alignment helps us to:

❯ **Standardise Security Controls**: Implement consistent security measures across all departments and regions.

❯ **Facilitate Continuous Improvement**: Regularly assess and improve our information security management system (ISMS) to respond to evolving threats.

❯ **Enhance Risk Management**: Identify, assess, and mitigate risks effectively through established methodologies.

❯ **Demonstrate Commitment to Excellence**: Provide assurance to clients, partners, and regulators of our dedication to maintaining the highest security standards.

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Control Risks

Cyber and data protection

People and processes

Internal training and raising awareness

Control Risks is committed to fostering a culture of security and data protection through comprehensive training for all employees. Training is mandatory at the time of induction and is refreshed annually. Delivered via our in-house eLearning platform, training is supplemented with targeted live sessions to address emerging risks and reinforce cybersecurity awareness.

Information Security Forum

Our Information Security Forum is a key mechanism for maintaining executive-level engagement in cybersecurity. Held quarterly with regional executive teams, the forum ensures the alignment of security objectives with Control Risks' strategic goals. Key responsibilities of the forum include establishing and integrating security policies, allocating resources, and promoting continuous improvement in security practices.

Risk Committee

The quarterly Risk Committee serves as our principal forum for comprehensive risk management oversight. Charged with upholding a robust Risk Management Framework and Strategy, the Committee's mandate includes unrestricted access to necessary information, personnel, and independent advisors. With executive members including the Chief Executive Officer, Chief Financial Officer and General Counsel, the Committee addresses risk identification, management, and mitigation strategies to ensure Control Risks remains resilient in a dynamic threat landscape.

Data Protection Officer

The Data Protection Officer (DPO) serves as our independent adviser for Control Risks' data protection obligations. The DPO is tasked with monitoring compliance with data protection law, managing internal data processing activities and is our designated point of contact for data protection regulators and individuals whose data we process. Our DPOs

report to the highest levels of management and operate independently to ensure they can give advice without reprisal. Our DPOs form an integral part of our commitment to responsible data processing and upholding our high standards of data privacy.

External engagement

Engagement with our clients

The rapid digitalisation of data and the ever-expanding landscape of cybersecurity and data protection regulation has propelled data governance to the forefront of client concerns, for which Control Risks is uniquely positioned to provide guidance and expertise. Control Risks is a leading contributor to the cybersecurity industry and in the safety of the digital world through our comprehensive service offerings.

Control Risks provides a broad array of cybersecurity services, tailored to support clients in managing risk, bolstering security posture and responding to incidents. Our offerings range from risk assessments and security program design to incident response and forensic analysis. Through these services, we support our clients' needs at every stage of their security journey, from preparation to crisis management.

Thought leadership

Each year, Control Risks produces RiskMap, an annual forecast of business risks that serves as a resource for organisations navigating an increasingly complex risk environment. Drawing on the expertise of Control Risks specialists worldwide, RiskMap provides a comprehensive view of global risks across political, security, operational, regulatory, cyber, and integrity domains. Through virtual events and written analysis, Control Risks aims to foster informed conversations on critical topics, supporting businesses and policymakers in making better decisions in a challenging landscape.

Plans for 2024−25
In the coming year we will:

❯ Embed a culture of cyber security and data protection which emphasizes both collective and personal responsibility. By enabling people to view security as a collective and collaborative endeavour that supports their everyday work, this initiative contributes to safeguarding information and strengthening our resilience against cyber threats.

❯ Implement an automated data deletion project to securely remove data that has not been accessed for over three years. The project will significantly reduce our reliance on manual deletion protocols, reinforcing our adherence to the principle of data minimisation and ensuring that data is protected by default and design.

❯ Transition to the updated ISO 27001:2022 standard. This upgrade reflects our dedication to evolving security practices, ensuring we remain aligned with evolving global standards. This reinforces our commitment to clients and stakeholders to safeguard their data with the highest standards of care and trust.

Control Risks is a global specialist risk consultancy that helps create secure, compliant and resilient organisations, providing the insight and intelligence to realise opportunities and grow.