

**Control Risks**

**50** Fifty years of  
looking forward

# Sustainability Report 2024–25



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# CEO's statement of continued support for sustainability

This report marks a pivotal year in Control Risks' ongoing commitment to sustainability, reflecting both our progress and our ambition for the future. Over the past financial year, we have made significant strides in embedding sustainability across our business, guided by our five focus areas: business integrity and ethics, human rights and labour, diversity, equity and inclusion (DE&I), environmental sustainability, and cyber and data protection.

Our achievements this year include:

- **Business integrity and ethics:** We maintained the highest standards of integrity, with our Ethics Committee reviewing 14 cases across diverse regions, ensuring our work consistently meets our ethical benchmarks. Our anti-corruption training and whistleblowing procedures have been strengthened, resulting in increased employee engagement and transparent resolution of concerns.
- **Human rights and labour:** We advanced our commitment to human rights, conducting modern slavery risk reviews in Iraq and expanding our due diligence processes for suppliers. Our Human Rights and Labour Subcommittee has driven new training and risk assessment frameworks, and our participation in the UN Global Compact's "Business and Human Rights Accelerator" has reinforced our expertise in this area.
- **Diversity, equity and inclusion:** We launched new initiatives such as regional graduate schemes, career frameworks, and leadership training, and expanded our flexible public holidays trial. Our people networks—Mosaic, the Women's Network, and Synergy—have continued to champion inclusion, earning recognition through industry awards and impactful events.
- **Environmental sustainability:** We established a comprehensive GHG emissions inventory across all operations, achieving only a 0.5% rise in relative

emissions despite a 121% increase in absolute emissions, demonstrating our ability to decouple emissions from business growth. We have increased our use of green electricity, engaged suppliers on Scope 3 emissions, and participated in global initiatives like Plastic Free July. Our commitment to net-zero emissions by 2050 remains steadfast, with annual reduction targets aligned to the Science Based Targets initiative.

- **Cyber and data protection:** We have strengthened our data protection and cybersecurity frameworks, maintaining ISO 27001 certification and aligning with the NIST Cyber Security Framework. Our ongoing investment in training, risk management, and AI governance ensures we remain resilient and trusted by our clients and stakeholders.

These achievements are the result of collaboration across our global teams, robust governance from our Board and Sustainability Committee, and the engagement of our clients and partners. We recognise there is more to do, but our progress this year gives us confidence in our ability to meet the challenges ahead.

As CEO, I reaffirm Control Risks' commitment to sustainability. I look forward to working with our people, clients, and stakeholders to build on these achievements and drive further positive impact in the year to come.

Sustainability is a shared responsibility. I encourage every member of the Control Risks community—employees, clients, partners, and suppliers—to actively engage with our sustainability initiatives, challenge us to do better, and contribute ideas and actions that will help us achieve our goals.

Together, we can create lasting value for our business, our communities, and the environment.

Nick Allan  
CEO, Control Risks



# About Control Risks

Control Risks is a global security and strategic intelligence firm that provides integrated physical and digital security with the best of human and digital intelligence. With more than 50 years of experience spanning 178 countries, we advise, solve problems and deliver solutions globally to protect people, assets and value. 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.

**In a changing world, we make the difference.**



# Structure of report

**This report covers our financial year ending 31 March 2025.**

**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 2025–26** summarises our objectives for the year ahead



# 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

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 below).
- **Environmental sustainability.** Control Risks recognises the need to embed all aspects of environmental sustainability across our business. (See Environmental Sustainability section below).
- **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.



# Business integrity and ethics

- **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.

## 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 2024-2025, 14 cases were referred formally to the Ethics Committee (compared with 16 for the previous period). 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.

### 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. Our whistleblowing hotline, operated by Safecall (an independent provider) continues to be accessible to all employees via email, an online form, telephone and, where possible, via freephone numbers.

There were 14 whistleblowing reports made in the course of 2024-2025. Although this is a considerable jump to the number of reports made in previous years, they were all connected to a single issue. A thorough investigation was conducted into the matter and whilst no evidence of





# Business integrity and ethics



wrongdoing was uncovered we were able to put in place useful mitigations to help resolve the issue and prevent it reoccurring.

### 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](mailto: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.”



# 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. Recent examples include an assignment to draft a business integrity policy package, for a rapidly expanding company in the Indonesian energy sector. This included an anti-bribery and corruption policy, third-party engagement procedures and internal investigation guidelines.
- Conducting risk assessments that are specific to each client’s business model, commercial sector and geographical region. A recent example was an anti-corruption risk assessment on behalf of a multinational engineering company to meet the requirements of the French anti-corruption legislation “Sapin II”.
- 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. In a recent example, we reviewed employee onboarding policies and procedures for a Mexican aircraft ground-handling service company in order to prevent infiltration by organised crime groups. Also in Mexico, we conducted a review of the internal controls of a large fast-food franchisee to minimise fraud risk within its complex, cash-driven operations.

- 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. In a recent example, we conducted a series of face-to-face workshops for an international healthcare company in South Korea.
- 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. For example, we recently investigated alleged procurement fraud and conflict of interest at a multinational retailer in France.

### Thought leadership

Our recent thought leadership contributions include the publication of our Corporate Compliance 2025 report. The report was based on a survey of 318 Compliance Officers working in 17 countries, with the largest single component (84 respondents) based in the US.

The report showed that there has been a shift in the role of compliance officers within organisations: they are increasingly likely to be seen as core business partners rather than fire-fighters. On a positive note, the report shows that ethics and values - rather than the threat of enforcement – are the key drivers of compliance. Nevertheless, the report points to significant gaps. For example, 45% of the organisations surveyed do not vet third-party suppliers before engaging them. Moreover, only 54% of respondents say that the compliance team has the final say in disputes with other internal departments.

We regularly share our thinking on ethic and compliance in our In Re podcast channel. Topics covered over the past year include strategies for AI adoption in compliance, as well as insights from the experience of women in investigations, and the challenges associated with regulatory risk in China, India and Africa.

Similarly, on the Insights page of our website, we provide commentary on issues such as the latest developments in US anti-corruption enforcement strategy, Spain’s corruption scandals and technology-enabled compliance.

Plans for 2025–26

In the coming year we will:

- Continue to develop new strategies to communicate and reinforce our ethical standards across our businesses.
- Develop further training modules on the technical aspects of ethics and business integrity engagements for consultants (e.g. in relation to risk registers) in the Asia-Pacific region and, drawing on the lessons learnt, share them with other regions.
- Continue to provide expert commentary as well as targeted guidance to our clients on the ethics and compliance implications of the rapidly changing global geopolitical environment.



# 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 reviewed in October 2025.



# Human rights and labour

## 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](http://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 section below).

## 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.

## People and processes

### Human Rights and Labour Subcommittee

At the group level our Sustainability Committee, which is made up of Control Risks Partners and subject-matter experts from a range of regions and commercial practices, coordinates our sustainability initiatives across a range of inter-related portfolios, including human rights. Since February 2024, the Human Rights and Labour Subcommittee has been operating 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, training, raising awareness and building capacity across the Control Risks’ international network.

### Risk assessment

#### Country and project risk

We maintain country-level risk registers as an established part of our broader risk management processes. In the year under review, we started the the process of rolling out a new risk management platform which includes a defined set of risk categories, including human rights, and this is expected to be fully operational by the end of 2025. “Risk owners” are required to provide a score for each of these risk categories

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. 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





# Human rights and labour

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.

## Modern slavery risk review in Iraq

In the year under review, we conducted the first of what is intended to be a regular series of modern slavery risk reviews relating to the employment of guards in our Iraq operations. In the pilot exercise, we interviewed Indian nationals who were working as guards on a project in southern Iraq. The interviews were conducted by a senior manager from our Iraq team, supported by a project manager who is a native speaker of Hindi. In designing the review process, we drew on the advice of one of our Middle East-based senior consultants who is a specialist in labour welfare assessments. The interviews were organized in small groups of three to

four employees, ensuring a comfortable and open environment. We found no evidence that the employees had paid recruitment fees, and there were no major concerns about working conditions. Drawing on the lessons learnt from the pilot process, we are now planning to conduct further similar reviews elsewhere in Iraq.

## 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.

Two of our consultants, based in London and Lagos respectively, have been taking part in the UN Global Compact’s “Business and Human Rights Accelerator”, a six-month training course designed to reinforce participants’ skill and expertise in the field. As part of this exercise, they have been conducting a special project on human rights issues relating to the management of security guards in West Africa.





# Human rights and labour

## External engagement

### 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. Similarly, our Business Intelligence teams regularly address companies’ human rights records as part of their corporate due diligence assessments.

Recent assignments include:

- A major project for global technology company to conduct investigations and create remediation strategies for migrant worker abuses at datacentre sites in Saudi Arabia. In the course of the project we conducted over 200 worker interviews, seven company audits and five accommodation assessments. We worked closely with the client to develop a labour welfare strategy that is ambitious but realistic and operationally feasible. This includes a new supplier onboarding strategy for migrant workers and a new auditing system to ensure that past abuses should not reoccur.
- A project for the Mexico-based branch of a development finance institution to promote more stringent human rights standards in investee companies’ security arrangements. We developed and delivered a gap assessment as well as a one-day workshop for a selection of investees.
- An assignment for an international energy company to assess the benefits of working with the Voluntary Principles on Security and Human Rights Initiative.

### 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. London-based Control Risks Partner Andy Cox is a member of SCEG’s Executive Committee. The group’s leadership works closely with ICOCA, including on human rights issues.

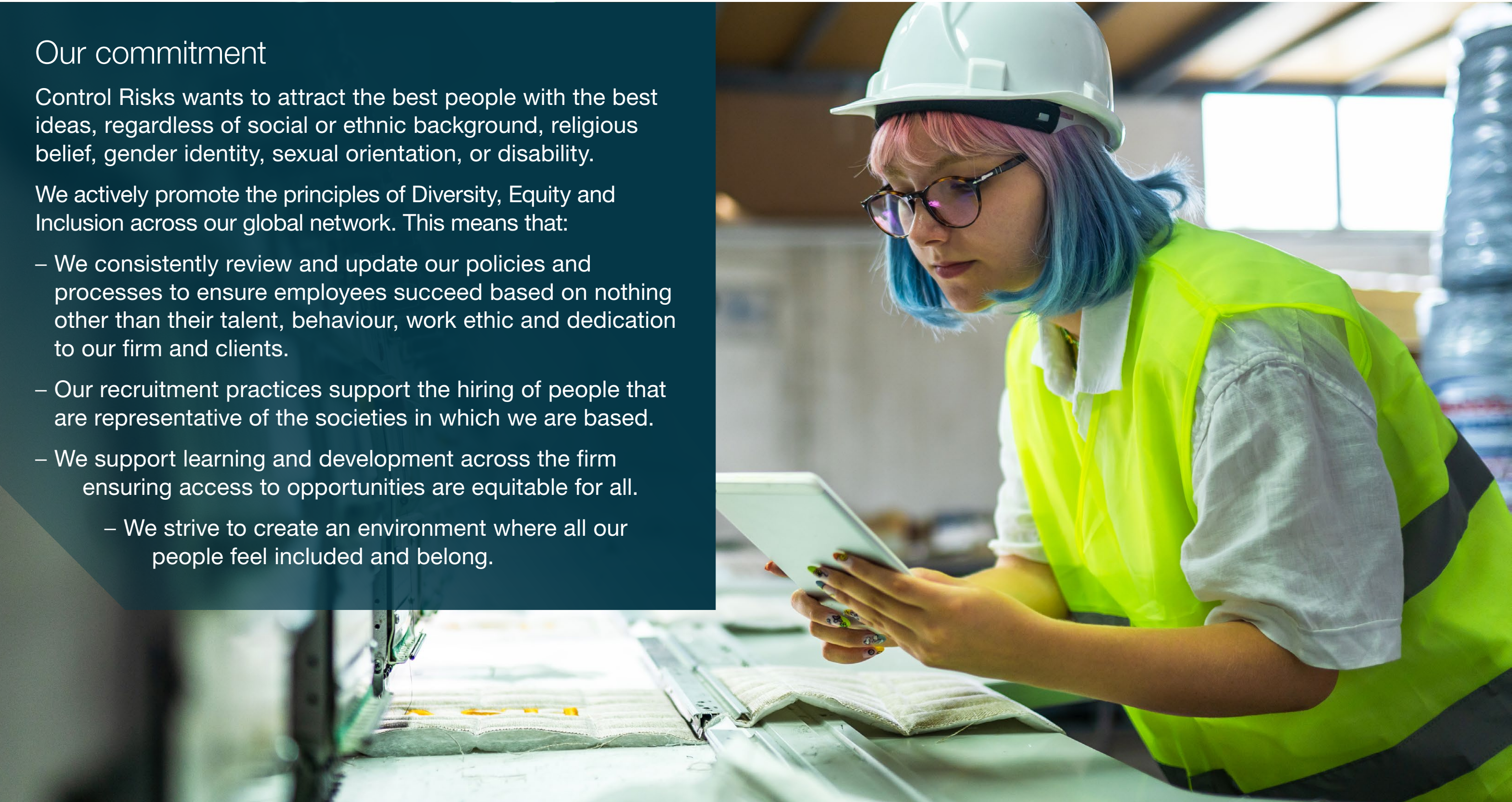
## Plans for 2025–26

In the year ahead, we plan to:

- Continue to develop new training frameworks for specific target audiences within Control Risks. In the coming year, we will be developing a new training package for consultants in the Asia Pacific region who are “embedded” with client companies. Building on the prototype, we then plan to share the lessons with other regions.
- Continue to develop the methodology/framework for modern slavery risk assessment in relation to the recruitment of guards in Iraq, starting with a further assessment in Baghdad.
- Follow up the UN Global Compact “Human Rights Accelerator” project on the labour welfare of guards in West Africa by presenting findings to senior regional management and conducting a more focused risk and impact assessment on one or more specific projects.



# 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.



# Diversity, equity and inclusion

- 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.



## 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 launched a Career Framework in the APAC region as a pilot. It outlines the technical capabilities required at each level consistent across the consulting practices to transparently calibrate promotions and support employee development.
- We broadened our approach to flexibility, reviewing where work is conducted. This has facilitated regional and global roles to be delivered outside of regional hubs which increases opportunities for advancement for populations who may not be able to move.

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

- We launched the Saudi Arabia graduate scheme aiming to build skills in the local market that are not readily available to meet our growth plans.
- We launched the Iraqi graduate scheme providing valuable opportunities in the local community and attracting fresh talent into the organization.
- We structured a trainee programme in America to support diversity at junior levels.



# Diversity, equity and inclusion

## To increase the proportion of senior leaders from underrepresented groups

- We launched Mentor Connect which is a platform to connect mentors with mentees on a broad range of topics ranging from technical skills to DE&I support such as female leadership, parenting and coming out in the workplace.

## For people to feel included and feel they belong

- We published our DE&I policy on our Company website to advocate externally what we do in support of DE&I.
- We launched bespoke leadership training in HRMS to equip employees with tools for excellence in emotional intelligence, DE&I and having difficult conversations.
- We won an award for the number of veterans hired in America.
- We extended the flexible public holidays trial in India to 4 other countries in APAC allowing colleagues to flex 3 public holidays to enable employees to celebrate the cultural and religious days that are important to them.
- Partners in APAC had a DE&I objective requiring them to evidence involvement in DE&I or wellbeing initiatives once a month throughout FY25.
- We offered access to Teams premium in America and Japan to access live captions to help where language is a second language.
- We hosted a series of events to raise awareness and understanding around diversity issues, these included: a panel discussion exploring views from different generations across a variety of work-related topics in APAC and Americas; events in all Americas offices on a DE&I topic relevant to their market to further discussion around DE&I and what employees would like to see in respect of DE&I.
- We continue to share news and events across the regions relating to cultural and religious celebrations.

## 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 2024-2025 initiatives included:

### Mosaic

- Winning a bronze award in the India Workplace Equality Index
- Winning a silver award at the Japan PRIDE Index
- Various PRIDE events around the globe in our regional offices in June 2024.

### Women’s network

- Creation of the Women’s Network Charter
- Volunteering for organisations that empower women and girls in Washington
- Local events such as celebrating the Olympics, speed networking, career pathways in security, selling yourself, public speaking, microaggressions and professional development
- Lean-in circles were crafted in APAC – a safe space for women to come together to learn research-backed strategies to advance their careers
- Celebration of International Women’s Day with events across all offices globally.





# Diversity, equity and inclusion

## 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, A large project investing in infrastructure in the UK requires us to report on the diversity of our employees deployed on the project. We provide a report every 6 months detailing diversity in our recruitment pipelines for roles on the project, along with ethnicity, age, disability, religion, gender and sexual orientation of current employees. We also track the diversity of our supply chain which supports delivery of the project and completion of DE&I related training aiming to make improvements in these areas as the project progresses.

Control Risks supported a multinational company in Mexico to strengthen its internal policies and controls surrounding harassment and discrimination at the workplace. After an internal investigation following accusations of systematic harassment and gender and socio-economic based discrimination, Control Risks helped the client review its entire program, adjusting not only formal policies and controls but also with a comprehensive overhaul of its program and the corporate culture and messaging around it, concluding with a series of tailored training sessions for managers and the entirety of the local employees.

A major international foundation was seeking a provider of political economy intelligence and analysis to support its programmes in west, central and southern Africa. Our points of contact emphasised that they would prefer to engage a firm that not only has a presence on the ground in Africa but also employs African nationals to provide the analysis. The proposal and project team we put forward to the client responds directly to this request and has so far been received positively by the Client.

We supported the sustainability team of a global energy company to identify emerging trends relevant to environmental and equality/diversity/inclusion issues. Our work is supporting our client to adjust to an evolving external environment without compromising on its commitments to equality and diversity.

We prepared a human rights gap assessment for a global logistics company, assessing how key issues such as DE&I and working conditions were integrated into its policies and procedures. We also identified material human rights issues for the client’s north Africa sites, with our findings focusing largely on how those sites could strengthen existing commitments to local content and gender equality in the workforce.



### Plans for 2025 – 26

In the year ahead, we plan to:

- Adopt a globally consistent, objective approach to recruitment using consistent process, interview templates and evidence-based scoring for interviews.
- Identify and trial a diverse job board specifically aimed at minority groups to widen the pool of candidates from diverse backgrounds.
- Ascertain motivation and scope for a people network for neurodiversity – support its implementation if interest allows.
- Launch a new e-learning module on unconscious bias training.
- Launch a veterans people network initially in the Americas.



# 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.

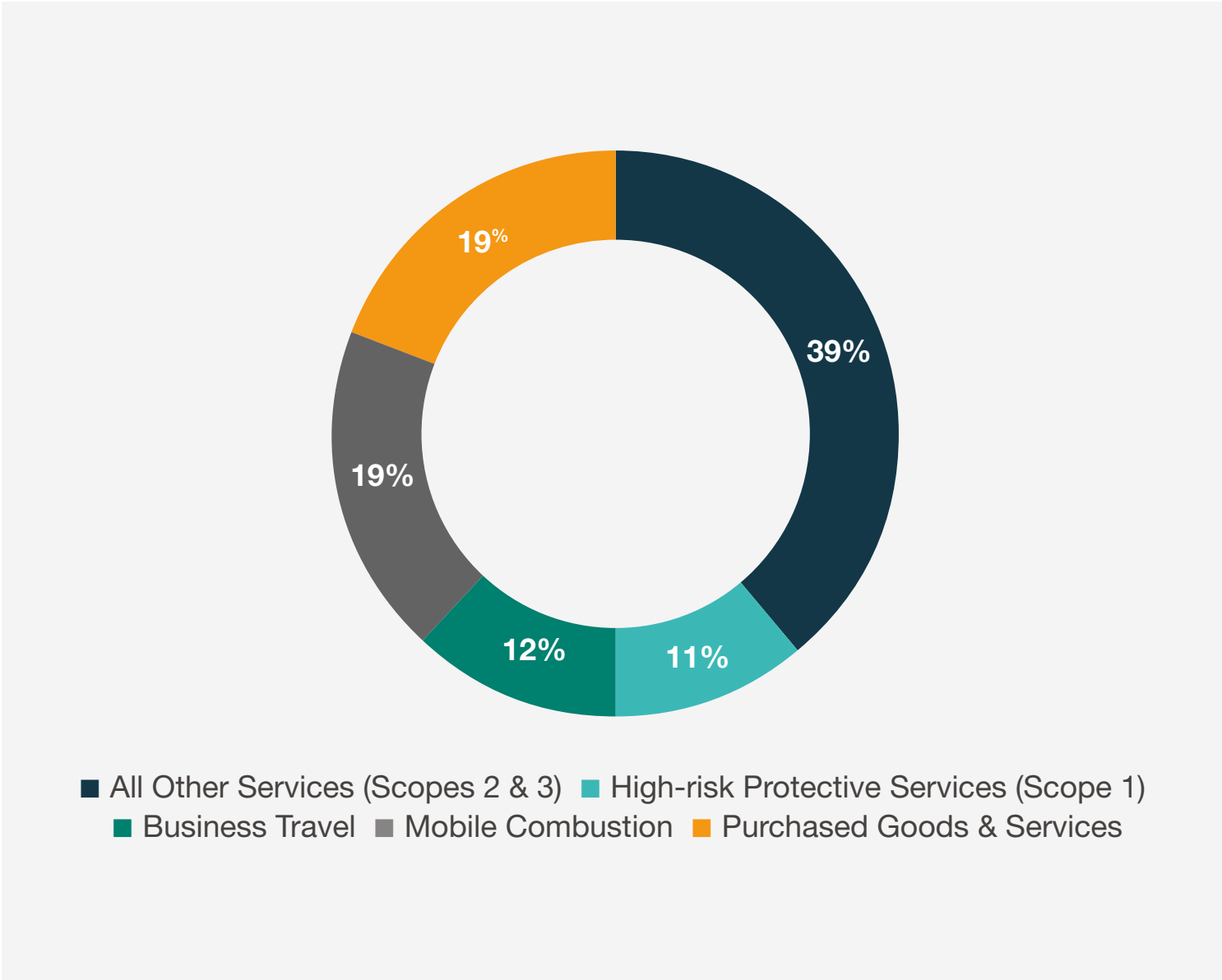
An e-learning module titled Health, Safety and Environmental is part of our global induction programme and this mandatory training is repeated every two years. The training includes a module on environmental sustainability and how employees as part of this training.

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.

Shrinking our greenhouse gas (GHG) output

Measuring and reporting our carbon footprint is essential in assessing progress and directing future effort. We continue to see an increase in client requests for information on our environmental performance, relationship reports and scorecards on sustainability rating platforms requiring full disclosure of our environmental performance.

Fig. 1 Control Risks’ GHG inventory, including Scopes 1, 2 and 3 emissions



In the reporting period we established our Scopes 1, 2 and 3 GHG emissions inventory for our operations in every country where we conduct commercial activities. 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 2024 and 31 March 2025, totalled 28,851 tCO2e<sup>1</sup> (made up of 9,500 tCO2e (for high-risk protective services, which operate a fleet of over 500 armoured vehicles) and 19,351 tCO2e (for all other services)). Business travel, mobile combustions and purchased goods and services are the biggest sources of emissions, accounting for approximately 32%, 21% and 19% of the total emissions, respectively.

In FY25, relative emissions rose by only 0.5% despite a 121% increase in absolute emissions compared to FY24. This was driven by strong revenue growth, which offset much of the increase in emissions.

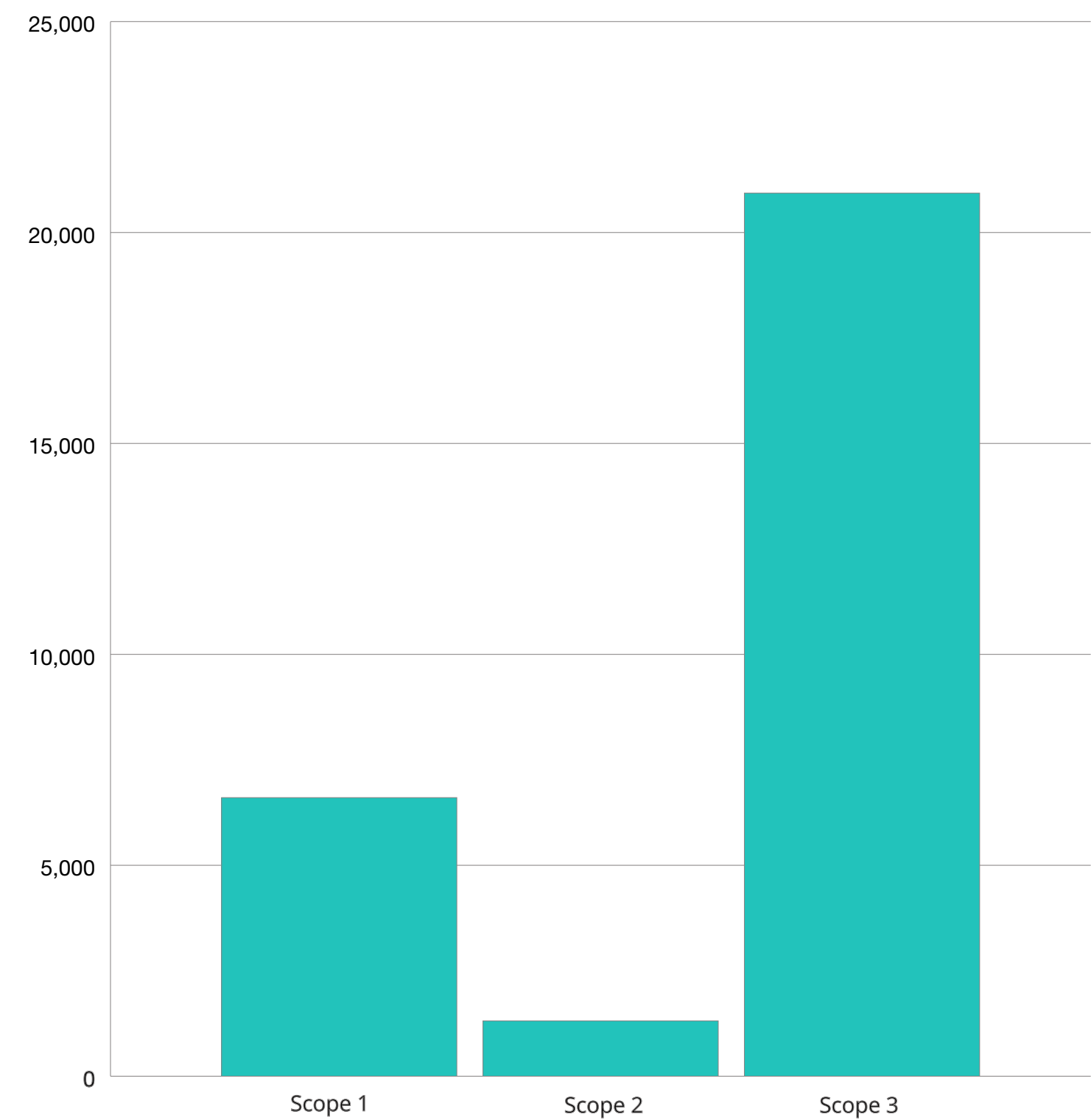
The trend underscores the company’s continued progress in managing its carbon footprint more effectively while sustaining business growth. It further demonstrates the progressive decoupling of emissions from economic activity, with relative reductions outpacing increases in absolute emissions.

<sup>1</sup> tco<sub>2</sub>e stands for tonnes (t) of carbon dioxide (CO<sub>2</sub>) 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.



# Environmental sustainability

Fig. 2 GHG emissions by scope (12 months to 31 March 2025)



## 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.





# Environmental sustainability



## Net-zero emissions

Control Risks is committed to achieving net-zero emissions by 2050, in line with the UK government’s legally binding target. We are working towards an annual reduction target of 7.5% for GHG, in line with SBTi (Science Based Targets initiative).

## 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 supported clients throughout the entire Net Zero process, from quantifying and understanding their GHG emissions, setting Science-Based Targets, establishing a Net Zero strategy including a review of their value chains, 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.

## 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 participated in Plastic Free July in 2025 and more than 30 Control Risks offices worldwide identified opportunities to reduce consumption of plastics and committed to the initiative. Our offices in Abu Dhabi, Dubai, Singapore, Bogota, Sao Paula and Panama have removed or cut down on individual desk bins which will reduce the use of plastic bin liners. Employees in the Houston office also received reusable shopping bags and silicone straws to encourage reduction of single use plastic bags and straws in everyday life. For office events which require catering, we will look towards procuring from vendors who focus on sustainable practices and cut down on the use of unnecessary plastic packaging.

## Plans for 2025–26

In 2025–26, we will focus on the following key activities:

- Manage our supplier and contractor relationships: We are working with suppliers and contractors and informing them of our environmental commitments through our Third-Party Code of Conduct.
- We have commenced discussions with our Tier 1 suppliers to understand the Scope 3 GHG emissions attributable to procured goods and services, which will assist us in reducing these emissions.
- Green electricity: We are increasingly encouraging offices to use green electricity. In FY25 a number of our offices (e.g., Houston, San Francisco, Amsterdam) procured green electricity. Over the next few years, we are planning to steadily increase the percentage of office that use green electricity to decarbonise our Scope 2 emissions.



# 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



# Cyber and data protection

- **Promote responsible use:** encourage employees to use ICT resources ethically and efficiently for legitimate business purposes
- **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





# Cyber and data protection



### 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

## People and processes

### Internal training and raising awareness

Cybersecurity and data protection are embedded into our culture through mandatory training for all Control Risks employees. Training is completed at induction and refreshed annually through our eLearning platform, with additional live sessions held during the year to address emerging risks. Our Information Security function oversees these programmes, helping employees to recognise threats, adopt secure behaviours, and protect the personal data entrusted to the company. By embedding awareness across the workforce, we strengthen resilience and trust, supporting the company’s long-term commitments.

### 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. By promoting secure-by-design principles and responsible use of technology, it contributes to long-term resilience and supports the company’s wider commitments.

### 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.

The Committee reviews risk identification, mitigation, and resilience planning across the business, drawing on input from specialist functions including Information Security. This approach ensures that cyber risks are addressed as part of wider enterprise risk management, and that areas such as digital resilience and responsible technology use are factored into long-term business planning.

### Data Protection Officer

Our Data Protection Officer (DPO) acts as an independent adviser on data protection obligations. The DPO monitors compliance with data protection law, oversees internal data processing activities, and serves as the company’s point of contact for regulators and individuals whose data we process. Reporting at the highest levels of management, the DPO operates independently to provide advice without reprisal and plays a central role in upholding our commitment to responsible data processing and high standards of privacy.



# Cyber and data protection

## 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 2025–26

In the coming year we will:

- Increase the operational maturity of our Data Loss Prevention (DLP) capability by evolving from detection to prevention-focused controls. We will embed DLP more deeply into our daily operations to support proactive protection of sensitive data and reduce the risk of unauthorised movement at scale. This strengthens our ability to prevent unauthorised data transfers and reinforces our commitment to protecting sensitive information in real time.
- Strengthen AI governance and oversight to support the safe and effective use of generative AI tools across the organisation. Building on existing responsible use principles, we will formalise decision-making, clarify accountability, and provide users with clear guidance that enables innovation while protecting data, reputation, and trust. This gives clients and stakeholders confidence that our use of AI is secure, ethical, and aligned with business objectives.
- Advance our cyber risk quantification capability by deepening integration between security and enterprise risk processes. Implementing a new risk management platform, we will facilitate data-informed risk insights that support better prioritisation, clearer articulation of business impact, and improved alignment between cyber initiatives and strategic goals. This improves transparency and enables more confident, risk-aware decision-making at all levels of the organisation.





Control Risks is a global security and strategic intelligence firm that provides integrated physical and digital security with the best of human and digital intelligence.

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