

2018



COMMUNICATION PROGRESS



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**We enable people and organisations to work,
live and thrive in new places around the world.**

Santa Fe Group is proud to present its ninth Communication on Progress report, affirming our continued commitment to supporting the ten United Nations Global Compact principles, along with our continued drive to align with the United Nations Sustainable Development Goals.

In the Santa Fe Group, we see sustainability as everyone's responsibility, and so we continue to engage with our customers, staff, suppliers and other stakeholders to fully embrace and support our policies in the areas of Human Rights, Labour, Environment and Anti-Corruption. We are fully aware of the responsibility we bear towards our stakeholders and the communities in which we operate.

We take the principles of the UNGC on with great enthusiasm, our teams globally are fully united under the Santa Fe brand and we thank our teams and partners for their continued support. Together we look forward to sustaining our support to this initiative and fulfilling our duty as a signatory to the UN Global Compact.



Martin Thaysen
CEO Santa Fe Group

The Santa Fe Group is a global leader in international mobility, handling around 40,000 international relocations and around 5,000 domestic relocations per year, based on own operations in 47 countries and a network of agents. Santa Fe's ambition is to make it easy for companies and people to work, live and thrive in new places around the world.

Santa Fe provide a full range of mobility services for multinational companies and other organisations having executives and professionals on overseas assignments. In addition to this, Santa Fe serve individual customers relocating without the support of an employer. The service offering covers the entire relocation journey—from Immigration Services to obtaining work and resident permits through the physical packing—and moving of household goods to a comprehensive range of value-added relocation and destination services to ensure the relocating family settles in to their new home in the best possible way. Santa Fe design and manage entire relocation programmes for large organisations with international operations. Our value proposition is to provide our corporate customers with optimum efficiency in their mobility management, full compliance with all relevant legal regimes, and a safe and easy transition and new start for the relocating individual and family.



Santa Fe Group's governing structure ensures that we are directed and controlled in a responsible manner, to ensure long-term sustainability and transparency. We transparently report our performance annually in terms of financial results, social responsibility and the operational aspects of our business.

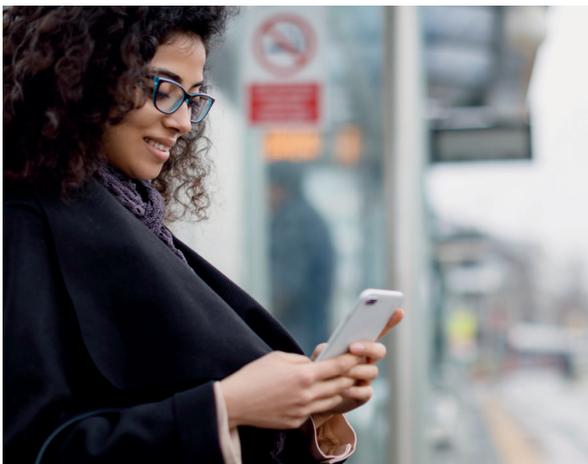
Our objective is to ensure our business remains sustainable in every meaning of the word. This means that we are able to provide our customers with a service that both offers value and continuity. It also means that through our continued commitment to aligning our operations and strategies with the ten UNGC principles, our company contributes and benefits economies and societies globally. The governance structure is anchored with a sustainability team aiming at aligning sustainability objectives, implementing and sharing best practices. The team consists of members in each region with overall responsibility held by the Santa Fe Group's Chief Financial Officer.



To act in a globally responsible way, we continually review our initiatives, codes and schemes so that we can learn from them. We pride ourselves on a fair, ethical and inclusive approach to our business, our people and our clients.

Our Code of Business Conduct provides guidance to all employees on the conduct of our business according to the highest ethical standards. We have grown and prospered with a culture of honesty, integrity and accountability. The Code contributes to our future success by helping to maintain this culture. The Code and our other ethics policies help to focus everyone on areas of ethical risk, offer guidance in recognising and dealing with ethical issues and provide mechanisms to report unethical conduct without fear of retaliation.

Continuing from our successful developments in this area from 2017, Santa Fe launched DNA 2.0, which is expected to consist of 120-130 workshops globally between the end of 2018 and mid 2019. With over 2,400 employees attending, including subcontractors, the sessions act to reinforce to our employees the key relationship between both our company values and two key internal focuses for 2018—GDPR and the customer experience. As part of our ongoing commitment to this, Santa Fe's company Purpose and Mission remain a core focus, giving all employees clear direction on what we do and stand for as a company but also how we understand and demonstrate the behaviours expected. Additionally, our company has increased the frequency of informational internal team briefings, promoting a company behavioural culture of transparency and knowledge. Not only has this enabled the Santa Fe family to be best prepared to provide high quality service to our customers, but this commitment has also enabled us to align ourselves with multiple UN Sustainable Development Goals, namely Quality Education.



Human Rights

Principle 1

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

Principle 2

Make sure that they are not complicit in human rights abuses.

Labour Rights

Principle 3

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

Principle 4

The elimination of all forms of forced and compulsory labour;

Principle 5

The effective abolition of child labour; and

Principle 6

The elimination of discrimination in respect of employment and occupation.

We commit to:

- + Continuous monitoring of our governance system to ensure compliance with basic human rights within our organisation and those with whom we interact.
- + Compliance with national legislation.

Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges;

Principle 8

Undertake initiatives to promote greater environmental responsibility; and

Principle 9

Encourage the development and diffusion of environmentally friendly technologies.

We commit to:

- + Reduce the negative impact of our business on the environment, meet or exceed regulatory requirements and continuously seek to improve our processes to achieve high standards.
- + Monitor and reduce carbon emissions.

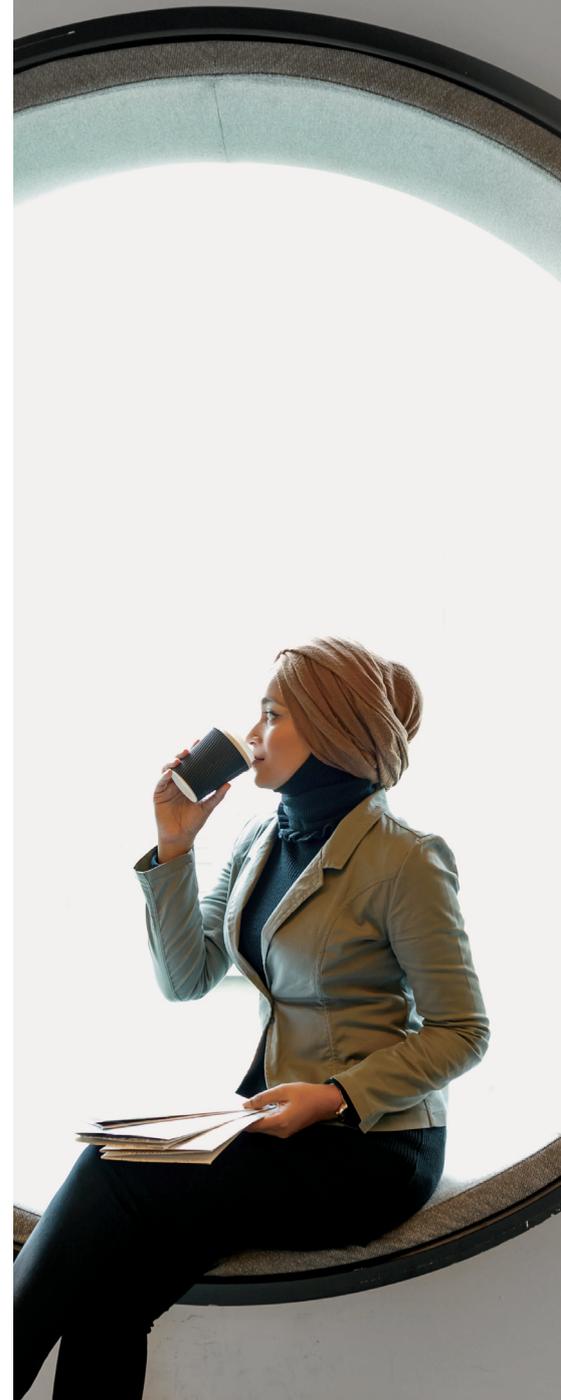
Anti-Corruption

Principle 10

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

We commit to:

- + Apply a zero-tolerance approach with respect to corruption, extortion and bribery.
- + Continuously identify ways of maximising the positive impact of our business operations where we have special skills, products or services to make a difference in the communities where we live and work.



As one of the four key focus areas of the United Nations Development Goals, Santa Fe remains fully committed to aligning ourselves with the appropriate principles in relation to human rights compliance across all offices. As the below section indicates, we have continued to progress and develop our policies towards an increased focus on a high standard of health and safety for all employees, suppliers and third parties, ultimately benefiting the mental and physical wellbeing of our employees.

Policy

In accordance with principles 1 and 2 of the Global Compact, Santa Fe supports and respects the protection of internationally proclaimed human rights and ensures that the Group is not complicit in human rights abuses

We endeavour to ensure:

- + Health and safety in the workplace
- + Wellbeing of employees
- + Good relations with local communities

Occupational Health and Safety are important priorities for Santa Fe and this area is actively managed by means of risk assessments and regular information to employees about avoiding accidents, illnesses and maintaining a healthy life-style. Occupational Health and Safety is more than a set of procedures and processes at Santa Fe as employees play an important role in contributing to a safe work environment e.g. by reporting accidents, communicating areas for improvement and adhering to company best practices. [The Santa Fe Group's Health and Safety policy](#) underpins our systematic approach to managing health and safety in the workplace. Standardised processes and internal and external audits ensure that minimum standards are in place throughout the company. In 2018, we have placed further focus on the wellbeing—both mental and physical—of our employees, through initiatives such as community-wide scavenger hunts and team-building events in the local community in our Indonesia office along with various Thrive @ Work initiatives in our South Africa office, including professional staff massages to maintain the physical health of our valued colleagues. Such initiatives in turn enable us to build a closer relationship with our local community and boost the positive local perception of the Santa Fe brand, along with enabling us to align with Goal 8 (Enabling Economic Growth) and Goal 10 (Reducing Inequalities) of the United Nations Sustainable Development Goals through our renewed focus on working towards empowering our local communities and peoples.

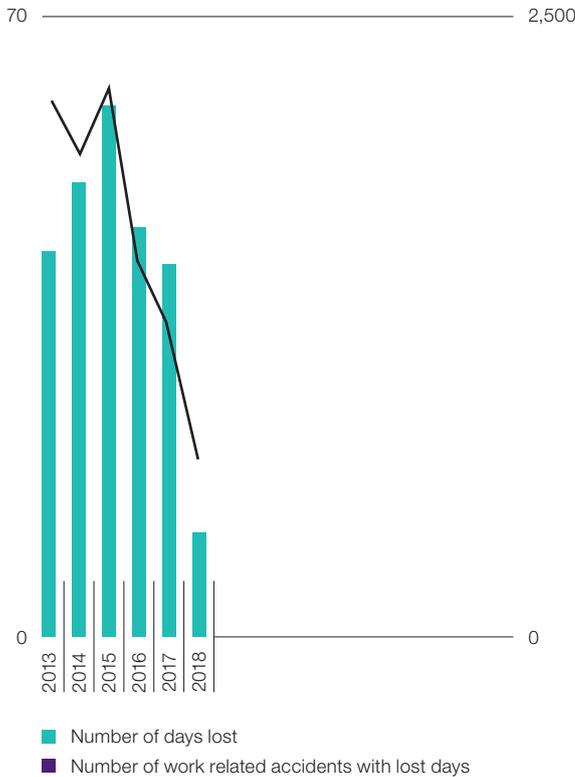
The Guiding Principles on Business and Human Rights, endorsed by the United Nations Human Rights Council in 2011, set out the responsibilities corporations have with respect to human rights. Those responsibilities include avoiding the infringement of the human rights of others and addressing any adverse impacts on human rights in which a corporation may be involved. The principles call on companies to institute policies and processes appropriate to their size and circumstances, as well as remediation processes to address concerns when they arise. Santa Fe has used the Guiding Principles, along with our membership in organisations such as the United Nations Global Compact and our ongoing commitment to the 17 United Nations Sustainable Development Goals, to inform and shape our approach to addressing and communicating human rights issues as well as our internal company culture.

Actions

Across 2018, the Santa Fe Group have introduced multiple initiatives to improve the health and safety of our organisation. This includes, but is not exclusive to, the attendance of a key safety course in affiliation with the Institute of Occupational Health and Safety by representatives of our India team, enabling a safer and higher quality working environment for our 280 employees across India. Additionally, our dedicated crews continue to adhere to the terms of the 'Health and Safety Methods Statement for Crew Operatives', which enables us to ensure we provide high quality and safe moving services to our customers, whilst actively ensuring the best health and safety for our valued crews across 96 offices in 47 countries. Initiatives such as these enable Santa Fe to continue to further progress our commitments to ensuring the health and safety of our employees worldwide in line with industry standards. We also align such commitments to any third parties and suppliers that complete work for or in cooperation with us, as we see place just as high value in the safety of these staff members as our own.

We continue to recognise the importance of an employee work-life balance and appreciate the value that out-of-work activities bring back into the workplace. Our Health and Safety Policy acknowledges that employee wellbeing is an important factor to maintaining good health. Our ongoing commitments to this in 2018 have seen the proactive introduction of a number of initiatives across our offices by our employees—most notably in South Africa where our Johannesburg and Cape Town offices have engaged with local non-governmental organisations to ensure the development and ongoing sustainability of the South African community. These activities continue to be shared throughout the organisation, primarily across various groups on Yammer.

Fig. 1: Work accidents with days lost 2013-2018



Risks

The main risks related to our activities include work accidents—especially for our operational staff—non-compliance with the Global Compact’s principles and the requirements of OHSAS 18001. To reduce the risk of work accidents, we apply a range of appropriate risk management measures, including the implementation of stringent health and safety policies which all staff across our 96 offices must follow. Any potential risks are monitored both locally and from our head office, enabling us to protect the professional environment.

Our business activities are subject to various local Health and Safety laws which enable us to be fully compliant in regards to Articles 1 and 2 of the United Nations Declaration of Human Rights.

Results

In the field of occupational health and safety, the number of accidents with time loss decreased by 44.44% and the number of lost workdays per accident decreased by 50%, as depicted in **Fig. 1**, ‘Work accidents with days lost 2014-2018’. There were no significant trends in the types of work accidents that occurred, and the positive reduction can be attributed to the ongoing integration of health and safety considerations in decision-making processes, focus on progressive and informative training, along with continued improvements in coordination across the organisation.

All OHSAS 18001 certificates were successfully renewed.

KPI's and targets

We measure and monitor the number of work-related accidents resulting in days off work. The KPI reflects developments in safety performance whilst our services are being performed.

As an ongoing goal, Santa Fe aims to reduce the number of work accidents with days lost to zero. We aim to achieve this by continuing to educate employees and integrating health and safety into our decision-making processes, as well as requiring specific managers to be responsible for the safety of their team or department.

In 2018, Santa Fe have deployed a corporate citizenship and philanthropic giving strategy, which has enabled us to develop a partnership with [The United Nation's Migration Agency](#), [International Organization for Migration \(IOM\)](#) supporting projects to help migrants work, live and thrive in new places around the world, which we hope to fully and formally roll out in the first half of 2019.

Another core focus area of the United Nations Development Goals, Santa Fe remains fully committed to ensuring free and fair labour rights for all employees globally. We remain and are increasingly focused on the education of our employees, at all levels, actively bringing us in line with Goal 4 of the United Nations Sustainable Development Goals (Quality Education), as the below indicates.

Policy

Santa Fe Group recognises that we work in a richly diverse community and understand the strategic importance of achieving a diverse workforce, which reflects that community. We undertake to recruit, develop and retain the most talented people by valuing the varied skills and experiences they bring to Santa Fe Group, and have identified key focus areas to ensure that we are equipping our people with the capabilities they need to achieve their career aspirations and help us meet our goals.

Key focus areas:

- + investing in employee training and development;
- + treating employees fairly and equitably;
- + combating harassment and discrimination at work, and
- + encouraging an honest and open culture which values the differences between us.

Retaining employees remains an important aspect of our business, and our goal is to remain an attractive employer respecting, supporting and adhering to internationally proclaimed human rights including the basic principles of the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work. Statistics relating to our absolute turnover indicate that staff satisfaction and loyalty at Santa Fe Group are on the rise, with nearly 75% of staff retained throughout 2018 in comparison to 66% for 2017. This clearly demonstrates the increasing attractiveness of Santa Fe as an employer in a challenging global market, which we hope to further develop going into 2019.

Pursuant to Danish legislation on gender equality, Santa Fe also has an objective for the proportion of the underrepresented gender on the Board of Directors. It is Santa Fe's ambition that 25% of the members of the Board of Directors are women. Consequently, Santa Fe will ensure that qualified candidates are considered before the Board of Directors proposes candidates to the Annual General Meeting. However, the Board of Directors' final submission of candidates will always be based on their actual competencies and experiences relative to Santa Fe's needs to ensure that the candidate deemed best qualified is proposed. This may mean that the ambition of a 25% female representation on the Board of Directors will always not be met, but it will continue to be a general ambition.

Santa Fe believes in equality; treating staff fairly regardless of their gender, sexual orientation, religion or any other potential means of inequality or discrimination. This actively brings us in line with goal 5 of the United Nations Sustainable Development Goals (Gender Equality) as well as ensures our compliance with the United Nations Global Compact. New members of staff and managers are recruited exclusively based on their qualifications and experience. Skills, performance and ethical conduct are our only indicators of employee qualifications. Santa Fe will not tolerate discrimination with respect to gender, race, age, religion, age, disability, sexual orientation, national origin, social status or any other protected discrimination grounds.

Santa Fe Group are committed to playing our part to ensure that there is no modern slavery or human trafficking in any part of our business and being alert to the potential for slavery and human trafficking within supplier or contractor activity. As a business, we aim to be honest and have strong moral principles in all our business activities. [Santa Fe's Anti Modern Slavery and Human Trafficking Policy](#) applies to all people working for us, or on our behalf in any capacity including external consultants, contractors and business partners. For example, we actively validate our Relocation Assignment Management suppliers against the Worldcheck system to ensure no criminal convictions relating to slavery have taken place, enabling us to further develop and provide excellency in our customer experience package to all our assignees worldwide.

In accordance with principles 3, 4, 5 and 6 of the Global Compact, Santa Fe Group:

- + Recognises the right of employees to be members of a trade union and negotiate pay and working conditions.
- + Supports elimination of all forms of forced labour.
- + Applies preventative procedures and practices to ensure that persons below the minimum age are not employed.
- + Endeavours to prevent discriminatory practices and secure equal opportunities by means of the application of procedures and practices to prevent discrimination in connection with recruitment or dismissal, career development, training and education or the granting of staff benefits.

Actions

In 2018, Santa Fe accepted its third graduate programme intake. As a global leader in full-service relocation, our two-year graduate programme (Accelerate) is designed to further extend Santa Fe's industry leadership through the recruitment and development of the strongest talent. With graduates placed in eight countries worldwide in locations including Group headquarters in London, the United States and the Asia-Pacific region, the programme offers practical, hands-on experience through a rotation programme that develops skills and knowledge across the breadth of the company's operations. Graduates will also gain the opportunity to learn directly from senior leadership with a dedicated mentor from Santa Fe's Strategic Leadership Team helping to steer their learning and development. On successful completion, participants will be placed into permanent roles across the globe or be deployed onto projects.

Santa Fe continued to take a globally consistent approach to performance management by introducing consistent metrics for our senior leaders, supported by the roll-out of a process through an online performance management system which ties seamlessly into our existing HR information and learning management system (Pulse), creating a compelling overall 'online bundle' for our employees. To ensure performance management has a positive impact, all full-time staff across the organisation continue to be encouraged to complete the process, which has been designed with constant feedback in mind, e.g. monthly one-on-one meetings between managers and employees to update one another on performance against objectives. This will reduce the potential ambiguity and stresses often caused by formal mid-year and year-end review cycles as employees will have received on-going feedback throughout the year.

Risks

The main risks related to our activities include non-adherence to Santa Fe's principle of preventing discriminatory practices and securing equal opportunities and potential legal, financial and HR-related consequences hereof. To counter this, Santa Fe Group have implemented several risk management initiatives. This includes encouraging a more positive, inclusive and gender equal company culture globally, increasing transparency in relation to gender balances in employment across the organisation and ensuring female representation in risk management strategising. We monitor any potential risks, both locally and from our head office, to prevent any possible impact on the environment.

Our business activities are subject to various national laws and regulations.

Results

Through our commitment to training and developing our employees, Santa Fe achieved the FIDI academy commitment to excellence Platinum award for the second year running. The achievement of this Platinum award is in recognition for driving and promoting industry knowledge amongst our employees via the FIDI FAIM programme hosted on Pulse.

In 2018, there were no changes to Santa Fe Group's Board of Directors meaning that Santa Fe does not meet its target of having 25% female representation on the Board. Santa Fe aims to ensure that there is female representation on the Board of Directors by 2020. On a global level across all employees, we have a far reduced gap between the numbers of male and female staff, with 45% of employees globally being female and 55% being male. This clearly defines Santa Fe's dedication to gender equality at work.

Fig. 2 'Gender ratio by seniority 2014-2018' shows that the overall female gender ratio increased by 0.89%. The ongoing trend of growth of female participation within middle management since 2015 can be seen again in 2018, with an increase of 1.67%. Slight growth can also be noted in male participation within both our office and operations staff.

In 2018, the voluntary turnover was 21.75%, a 3.25% decrease from the previous year, as depicted in **Fig. 3** 'Employee turnover ratio 2014-2018'. The absolute turnover ratio increased by 4% to 28%, as shown in **Fig. 3**, 'Employee turnover ratio 2014-2018'. The increase can be attributed to restructuring and downscaling of the business due to the lower activity within the relocation market globally which will impact the retention within the business.

KPI's and targets

Santa Fe measures and monitors:

- + Gender ratio by seniority.
- + Employee absolute turnover.

In 2019, Santa Fe aims to have an annualised attrition rate of no more than 15%.

Fig. 2: Gender ratio by seniority 2014-2018

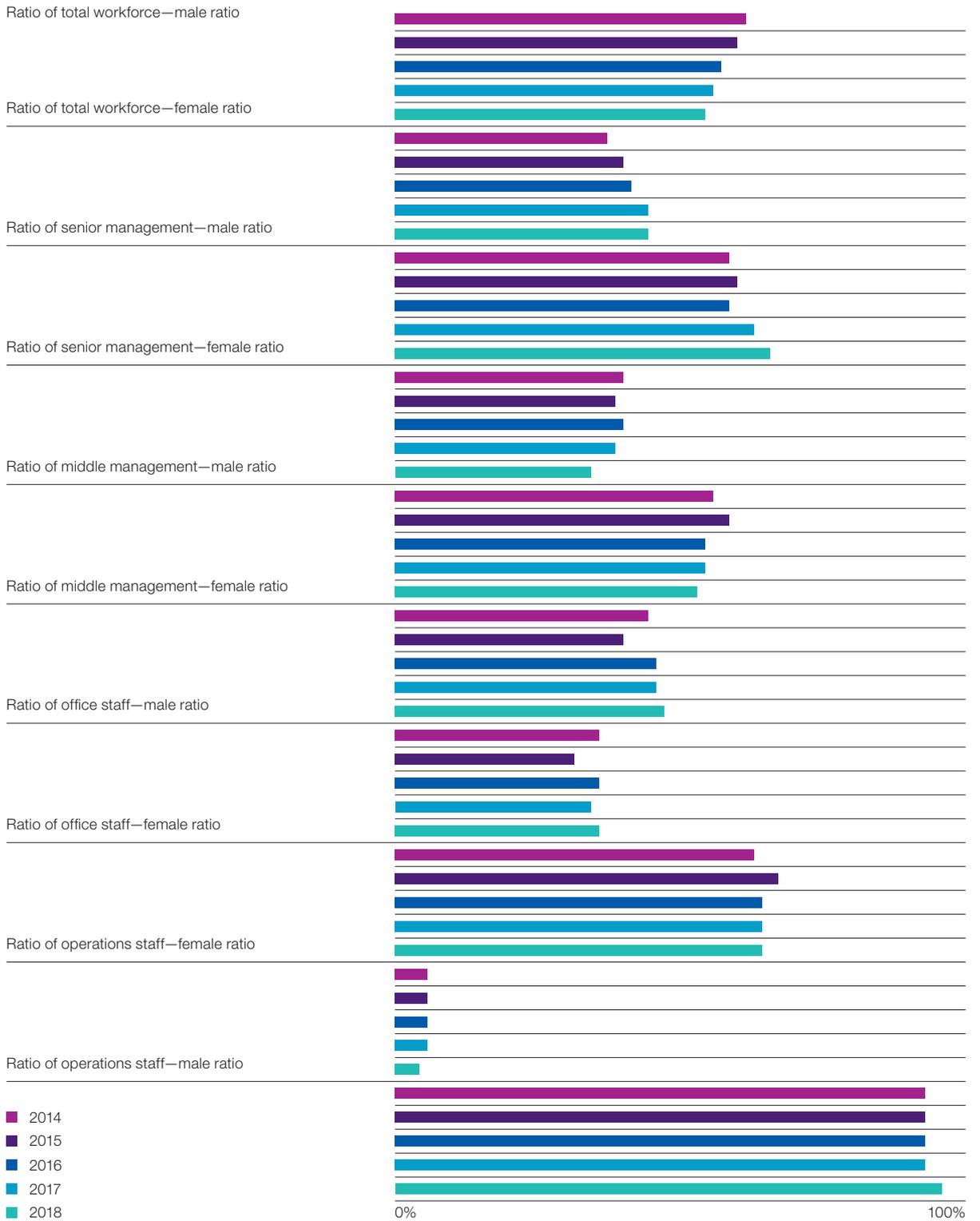


Fig. 3: Employee turnover ratio 2015-2018



An increasingly vital area focused on in the United Nations Development Goals, which must be a core focus for all successful corporate businesses, Santa Fe remains fully committed to ensuring our daily practices are delivered with the sustainability of the environment in mind. As the below sections indicates, 2018 has been a key year for Santa Fe Group in this commitment, with multiple office-based initiatives introduced, driven by a desire to protect our local and global environment.

Policy

Santa Fe supports a precautionary approach to environmental and climate challenges, undertake initiatives to promote greater responsibility and climate friendly technologies in accordance with principles 7, 8 and 9 of the Global Compact, and Goal 7 (Affordable and Clean Energy) and Goal 12 (Responsible Production and Consumption) of the United Nations Sustainable Development Goals.

We systematically and proactively protect, respect and safeguard the environment and climate in daily business activities by development of production methods and products, training of employees and influencing suppliers and stakeholders.

[Santa Fe's Environmental Policy](#) is intended to be sustainable and is being integrated into our day-to-day business practices. As such, this policy is communicated to all staff members and is also available to the public. Santa Fe applies recognised Environmental Management Systems such as ISO 14001 (or its local equivalent) based on the principle of continuous performance improvement. These systems are the basis for the deployment of key elements which include risk analysis, monitoring of environmental performance and compliance to regulations and permits, follow-up of the corresponding corrective actions, review of performance and improvement plans by the management.

Our objectives are to reduce our impact on the environment year-on-year by:

- + Minimising our waste by applying a reduce-reuse-recycle philosophy.
- + Becoming more energy efficient, thereby reducing our greenhouse gas emissions.

Actions

Santa Fe's Household Goods services continues to be heavily reliant on natural resources, in particular materials such as paper, cardboard, plastic, etc. We continued our efforts in reducing waste by the application of our reduce-reuse-recycle philosophy. This involves reducing the amount of packing material being used. Santa Fe has a variety of packing training for employees which also educates them on the amount of material needed to be used to ensure that goods are properly protected. Santa Fe has looked at a number of opportunities for reusing packing material, ranging from charitable donations and aiding with local relief work, to ensuring such materials are re-used on household goods moves. We have continued our efforts to recycle as much waste as possible and have built relationships with waste management companies looking at innovative ways to recycle different types of waste. This financial year has seen a positive shift in our environmental commitments globally, with an increased focus on recycling across our offices, and the implementation of multiple office-specific initiatives, resulting in staff across our offices recycling far more than previously.

Following its roll out in 2017, Santa Fe's virtual survey tool continues to be a success throughout the company, with over 1,300 virtual surveys carried out in 2018 globally. The virtual survey tool is an innovative mobile technology that modernises the business of moving and allow surveys to be conducted virtually. This has numerous positive impacts for the moving process but also reduces the fuel being consumed from having a surveyor travel to conduct the survey.

As we grow and increase sales and delivery of our services, we continue to look for ways to increase the efficiency and reduce emissions levels of our fleet. Many of these initiatives have required no additional investment; by promoting the choice of lower-emission models for our fleets, we have continuously improved the way in which they are maintained and how their routes and volumes are scheduled. This has produced a number of notable successes, including a near 50% reduction in emissions from our fleet at our head office in the United Kingdom, in line with increasingly stringent emissions policies implemented by those governing the City of London.

Risks

The main environmental risks related to our activities include excessive emission of CO₂ and waste.

Our activities are subject to environmental laws and regulations governing, among other things, waste disposal and emissions. Risks are monitored locally and from the head office to prevent, remedy or minimise any adverse effect on the external environment.

KPI's

Santa Fe measures and monitors:

- + Waste distribution
- + Fleet fuel consumption per tonnage [MJ/M3]
- + kWh electricity consumed per employee
- + GHG Impacts by scope.

Results

Fig. 4 'Waste distribution 2014-2018', shows that 2018 saw a 15% decrease in the amount of waste recycled to 65% along with a 1% reduction in the amount of waste incinerated to 1%. A 16% increase in the amount of waste sent to landfill in 2018 can also be seen, rising to 34%, which can be attributed to an increase in the amount of office paper being sent to landfill, and a decrease in the amounts of carton, paper packing and office paper being sent for recycling. The positive reduction in waste being sent for incineration was mainly attributed to a decrease in the amount of wood being disposed of.

Opportunities for improvement have been identified by means of the quality of data being provided in several locations with the biggest impact in our Australia operations where due to process changes there have been difficulties in quantifying the exact amount of waste being disposed of.

The energy used per cubic meter of goods moved by road on our fleet increased by 194% from 92.6 MJ/M³ to 273 MJ/M³ as shown in **Fig. 5** 'Fleet fuel consumption per tonnage [MJ/M³] 2014-2018', indicating a continuing growth in the both the number and scale of road shipments in 2018 when compared to 2017. This could be attributed to a number of factors, including increased links in the supply chain requiring more third-party involvements and various global socio-economic and geopolitical factors, dependent on the location of the shipment. For the most part, this increase in energy usage per cubic meter of goods moved by road freight can be found in our European offices, where there has been an increase in cross-border relocations.

Electricity consumption decreased in 2018 by 26.29%. The consumption per employee reduced by 26.31% to 1,078 kWh of electricity consumed per 2,173 employees (**Fig. 6**, kWh electricity consumed per employee). This result continues to be influenced by a number of locations running electricity saving schemes involving initiatives such as turning off the lights when not in use, and auto shut down of computers after working hours. In addition, energy consumption plays a key factor in our procurement decisions and a key deciding factor of purchasing new or replacement hardware or equipment is how energy efficient it is.

Fig. 7 'GHG impacts by scope 2014-2018', shows that there was a significant decrease in Santa Fe's GHG emissions. There was a 26.8% decrease in Scope 1 GHG emissions as a result of reductions in fuel and electricity consumption, with a reduction of 22.77% in Scope 2 emissions may be attributed to similar factors. A significant reduction in Scope 3 GHG emissions was also seen across goods transported by third parties by sea (**Fig. 8** 'Greenhouse gas impacts, scope 3 by mode of transport').

All ISO 50001 and ISO 14001 certifications were successfully renewed.

Targets

In 2019, we aim to recycle 80% of all waste produced from cardboard and paper, and reduce the amount of plastic and household goods waste being sent to landfill by 2%. This will involve establishing better process flows with waste management companies we work with and a streamlined workflow with subcontractors that sometimes dispose of waste on our behalf.

We shall reduce the MJ per cubic meter moved by our fleet to 250MJ/M³. This target has been changed to reflect the changes in business activities in comparison with previous years. With reduced opportunities to consolidate shipments, we have determined that this new target of 250MJ/M³ is an appropriate target for 2019. This can be achieved by increasing our efficiency in the scheduling and route planning of our fleet, and also continuously improving the way in which our vehicles are maintained.



Fig. 4: Waste Distribution 2013-2018

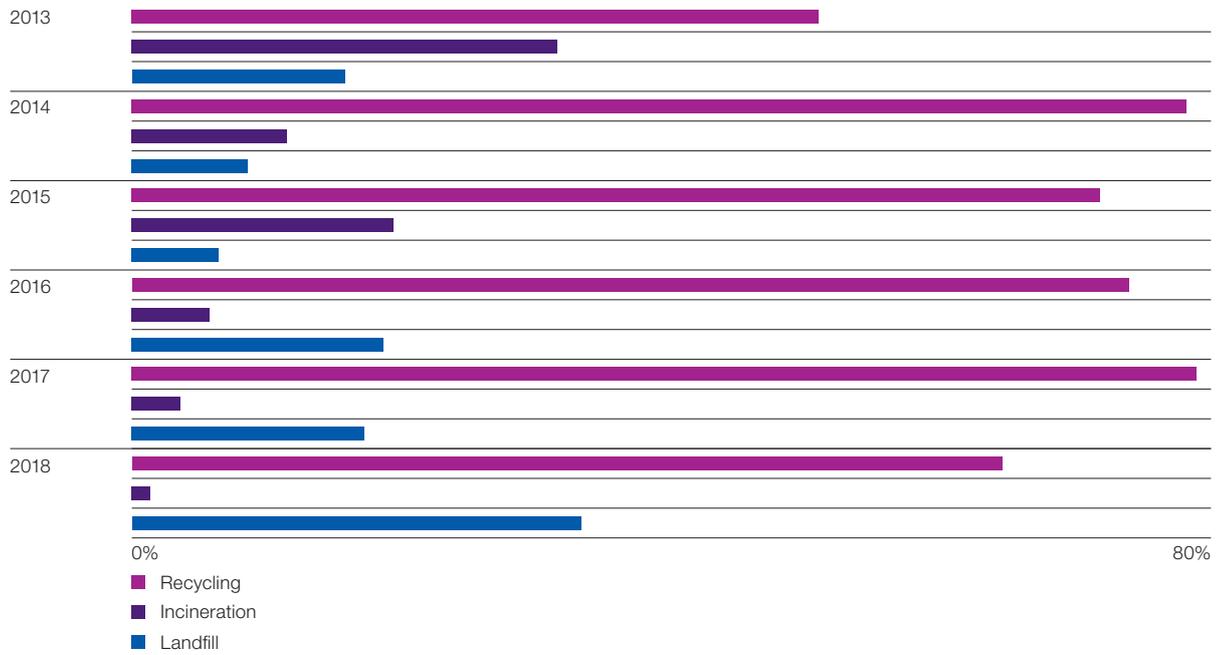


Fig. 5: Fleet fuel consumption per tonnage [MJ/m³] 2014-2018

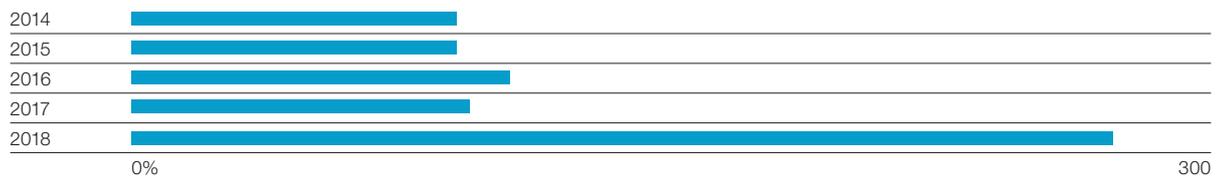


Fig. 6: kWh electricity consumed per employee 2014-2018



Fig. 7: Greenhouse gas impacts by scope 2014-2018

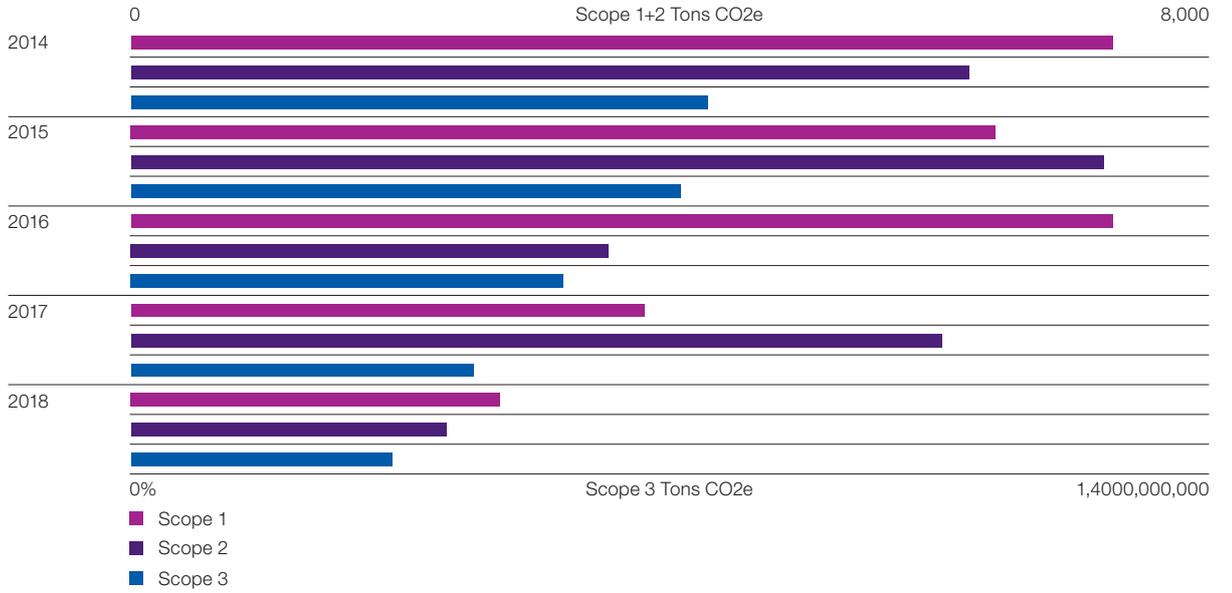
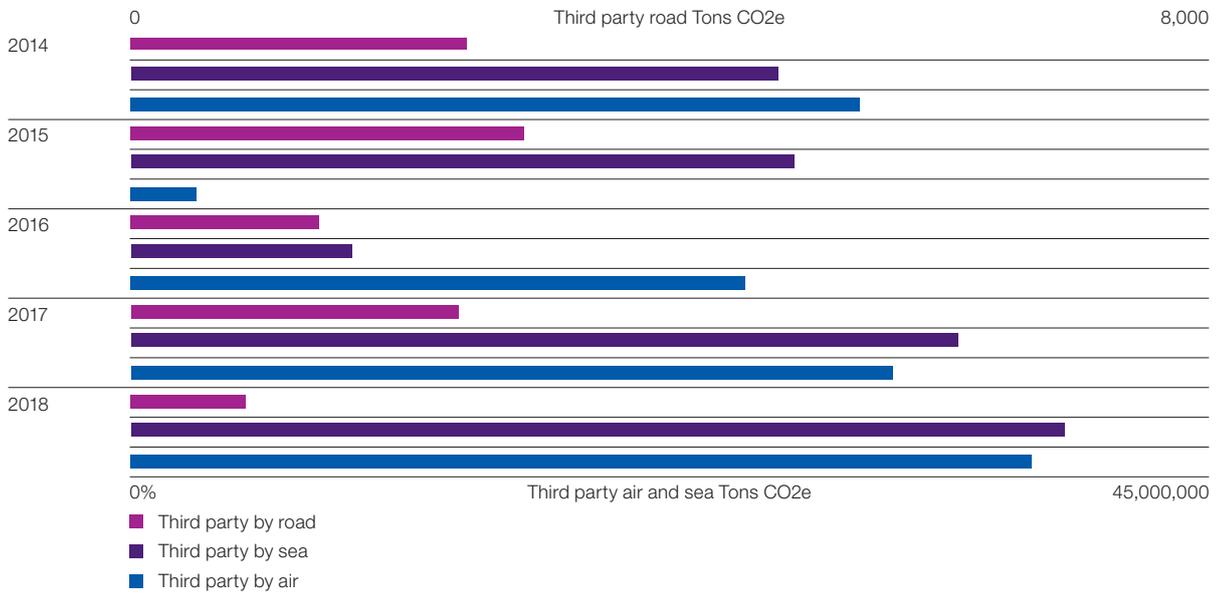


Fig. 8: Greenhouse gas impacts, Scope 3 by mode of transport 2014-2018



The final area of the United Nations Development Goals to be focused on in this report is the adoption of policies which ensure appropriate individuals and parties adhere to stringent anti-corruption regulations. This is important for the ongoing development of a progressive and sustainable corporate business. Santa Fe continues to be fully committed in this regard, through various practices as listed below which has helped us to become a trusted and recognised industry leader.

Policy

Our main activities covering the principles in UN Global Compact regarding anti-corruption are detailed within our [Code of Business Conduct](#).

According to these, all Santa Fe employees are expected to:

- + Apply a zero-tolerance approach towards corruption, extortion and bribery.
- + Behave honestly, be trustworthy and set a good example.
- + Do not pay or accept bribes in any form.
- + Do not accept or provide gifts, invitations or other advantages which could create a possible conflict of interest.
- + Do not engage directly or indirectly in fraud against any of our partners or government entities.
- + Do not engage directly or indirectly in bribery.
- + Refuse to pay any bribes, including small amount bribes or facilitation payments.

All employees are expected to complete training on the Code of Conduct when they join the company and annually thereafter. It is available in 14 languages, and the eLearning Integrity training sessions incorporate real case scenarios. Employees are encouraged to raise ethical questions and concerns, and have multiple channels to do so—anonously, if they prefer—whilst actively ensuring any colleagues who may face accusations in this regard are given a fair and free opportunity to be heard, with an unbiased and fair decision reached.

[Santa Fe's Integrity Policy](#) cements and elaborates our position against corruption and bribery.

Actions

Santa Fe's CEO sets the tone for our ethical culture by role-modelling ethical behaviour and holding managers accountable; communicating policy and conduct expectations; and overseeing business group ethics and compliance systems. At the beginning of each year, our CEO, General Counsel and Group Leadership Team communicates with employees and managers about the importance of ethics and legal compliance. This “tone from the top”—combined with our annual ethics and compliance training, regular communications throughout the year, and educational resources on Yammer and our learning management system—helps to create an ethical and legally compliant culture.

Santa Fe's enhanced supplier due diligence on boarding process proceeded throughout 2018, which included partner agreements, due diligence questionnaires including submission of key documents including but not limited to: Company registration certificates, VAT/Tax registration certificates, anti-bribery and corruption policy, ethics policy, data protection policy, environmental policy, necessary insurances and licences, credit checks to ensure the financial stability of our suppliers and a robust verification process via 'World Check' to identify any connections to pending or convicted criminal activities as well as any associations with politically exposed persons.



Finally, 2018 has been a pivotal year across the corporate landscape in relation to data integrity, with the introduction of the General Data Protection Regulations being introduced as of 25th May 2018. The regulations concerned place significantly increased scrutiny on several key areas relating to personal data, including the collection and storage of the data of all our assignees globally and reduction on the transmission of this data unnecessarily. Santa Fe Group have always placed the protection of our assignees' data at the forefront of our service delivery, to ensure an excellent customer experience for all our assignees, with these regulations placing an increased awareness on the matter.

The four main progressive changes Santa Fe Group of note has made following the implementation of these regulations are:

1. Over the past two years, in preparation for GDPR, all data has been migrated from legacy systems to a new application built on the Salesforce platform, thus ensuring best of breed in all aspects of security
2. Processes and procedures within our ISO 27001 certification framework have been updated to ensure global compliance with GDPR
3. Additional technical and organisational measures have been implemented to further enhance our stance with regards GDPR.
4. A reinvigorated drive and focus on training our over 2,300 employees globally on the importance of GDPR and data integrity has ensured that our customers can be confident that their personal data will be treated with the utmost care and discretion throughout their relocation with Santa Fe.

Risks

The main risks related to our activities include employees and suppliers' violation of Santa Fe's compliance policies and potential legal and financial consequences hereof.

Our business activities are subject to various national laws and regulations as well as legislation with an international reach. We continue to monitor any potential risks to protect the workplace environment, both at a local level and at our head office.

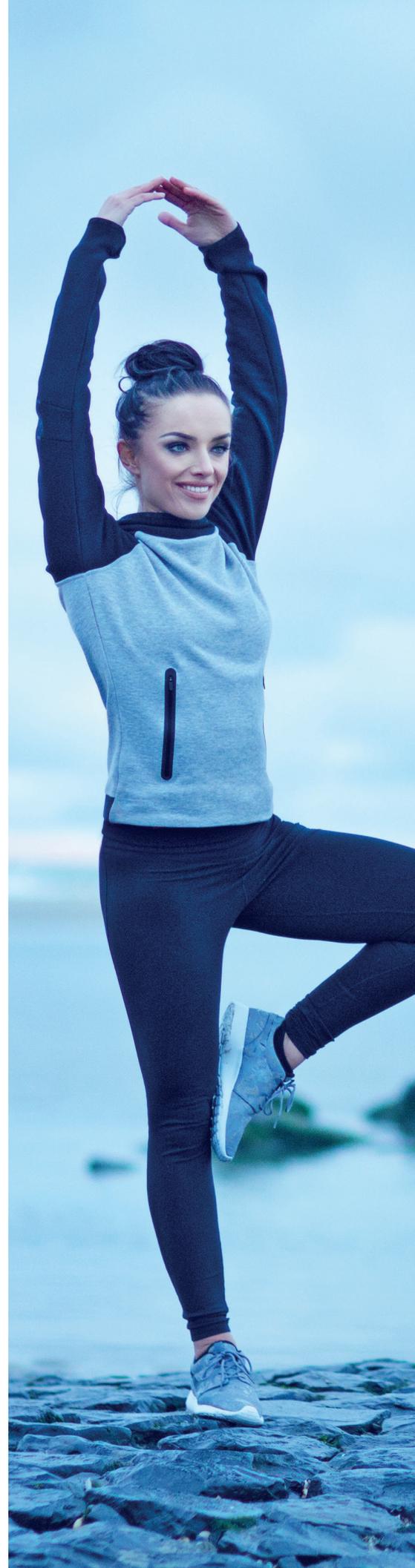
Results

Continuing from 2017, 2018 has seen 100% of employees completed the eLearning Integrity curriculum consisting of modules on anti bribery and corruption, competition law and data protection.

KPI's and targets

We monitor results of internal anti-corruption training and supplier audits on an ongoing basis and adapt our policies and processes if necessary.

As an ongoing target, in 2019, we aim to have 100% of employees to complete the code of conduct and suite of eLearning Integrity training.



Our mission is to deliver exceptional relocation experiences for our customers.

About Santa Fe Relocation

Santa Fe Relocation is a global mobility company specialising in managing and delivering high-quality relocation services worldwide. Our core competence is providing services that help corporations and their employees as well as individuals and their families to relocate and settle in new places. These services are delivered to a consistently high standard, locally and globally, and managed through our own operations around the world. Santa Fe Relocation is wholly owned by the Santa Fe Group, which is listed in the Nasdaq in Copenhagen, Denmark. For more information, visit us at [santaferelo.com](https://www.santaferelo.com)

Environmental Responsibility As outlined in our Communication on Progress report, we take our environmental responsibility very seriously. We always aim to use printers that are FSC certified. This means that the printer purchases and uses wood, paper, and other forest products produced from well-managed forests and/or recycled materials. If you have received this document electronically, please consider your environmental responsibility before sending to print.

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