

UN GLOBAL COMPACT COMMUNICATION ON PROGRESS 2014





STATEMENT FROM THE CEO

The Santa Fe Group is delighted to present its fifth Communication on Progress Report reaffirming our comtinued commitment and support for the Ten Principles of the UN Global Compact.

Sustinability is at the heart of all that we do and we continue to view corporate and social responsibility as our practices and policies that contribute to the well being of the environment, economy and society. Our Corporate and Social Responsibility to our stakeholders means that our services create sustainable value for our customers and contribute to the well being of society. We commit to operating using ethical business practices and expect the same from our suppliers and business partners globally. We stand strong in our resolve to minimising the environmental impacts of our services, having a zero tolerance approach to corruption in all its forms, providing jobs and making a profit. We believe in treating our employees fairly and with respect and being a good neighbour to those within our local communities and well as those globally.

Our Business Conduct Guidelines articulate our values, particularly as they relate to human rights, fair labor practices, anti-corruption and the environment. They apply to all Santa Fe employees, all over the world, and guide our engagements with all our stakeholders, employees, communities, customers and investors.



LARS LYKKE IVERSEN

As a Company, we are committed to ensuring that business is performed in a sustainable and ethical manner. We look forward to our continued participation with the United Nations Global Compact as we move forward with our commitments to the Compact Principles

Lars Lykke Iversen CEO of Santa Fe Group

ABOUT SANTA FE GROUP

The Santa Fe Group is a global market leader in international employee mobility and workplace services.

The Santa Fe Group provides a wide range of services that facilitate an efficient execution of corporate customers' international and domestic relocation needs as well as services designed to support direct consumers

BUSINESS STRUCTURE AND ORGANISATION

Santa Fe Group is headquartered in London, United Kingdom with regional hubs in key global locations.

Our core competence is our ability to provide services to a consistent, unifying high standard; locally and globally a key aspect of this is our own offices, delivering services in critical locations that multinationals find most challenging.

These services are delivered via World Link, our global network, consisting of own offices and Approved Partners.

OUR VISION

Our Vision is to deliver sustainable value through innovation

- We expand our geographic coverage to remain an attractive supplier of moving, relocation, assignment management and records management services
- We engage directly with our corporate clients and customers to better provide service and support
- We help customers to fulfil their commitment to social, environmental and economic sustainability by operating in a way that respects and contributes to positive development for people, planet and profit
- We envision responsible moving and relocation services with minimal negative impact on the environment.

OUR MISSION

Our Mission is simple. "We make it easy"

- We will make it easy for corporate clients, individuals and partners to do business with us
- · We will make it easy for our internal organisation to work efficiently and effectively
- We will make it easy to continuously contribute to social, environmental and economic sustainability based on our business model, competencies, innovation and technology

OUR VALUES

Quality, Efficiency, People, Safety, Respect and Ethics – define the basic behaviours of our people and the way we do business

- We will strive to have the highest quality standards in the industry
- We will attract, develop and retain the best people in the industry
- We will offer equal, attractive and flexible career opportunities.

GOVERNANCE PROCESS

Santa Fe Group's governing structure ensures that we are directed and controlled in a responsible manner, to ensure long-term sustainability and transparency.

Our financial, social responsibility and operational aspects of our business are transparently reported on a quarterly basis.

Santa Fe's aim is to ensure that our business continues to remain sustainable – meaning that we are able to continuously provide our customers and business partners with a service that offers both value and continuity. In addition through our continued commitment to aligning our operations and strategies with the ten UNGC Principles Santa Fe contributes and benefits economies and societies globally.

Corporate and Social Responsibility remains an integral part of daily business operations and decision making in the Santa Fe. The governance structure has been strengthened 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 CFO.

Santa Fe's corporate responsibility strategy contains five prioritised areas:

Ethics and behaviour

Binding guidelines with the aim of ensuring that all employees perform their duties in accordance with our business ethics.

Supplier standards

Ethical standards that our suppliers must follow and we will ensure that these standards are, at a minimum, in compliance with the UN Global Compact.

Health and safety

Ensure a healthy working environment for our employees.

Environment

Assume responsibility for reducing our environmental footprint.

Anti-Corruption

Maintain a zero tolerance approach to anti-corruption in all its forms.



PEOPLE

People are at the center of everything we do. That is why we do everything we can to attract, develop and retain the best people in the industry.

RESPECT

Each other, the environment and the values of others.

ETHICS

An ethical and transparent approach to working.

SAFETY

A duty of care to our employees, our customers, community and each other.

EFFICIENCY & QUALITY

Achieved through continual improvement through refinement and innovation.

PROACTIVE

To work proactively, through regular communication, anticipating outcomes and planning ahead. Never assume or leave anything to chance.

RESPECTFUL

To show respect for our customers, work colleagues, our community and the environment. To understand how each of our roles are part of something much larger and that every action has an outcome.

INNOVATIVE

To strive for continual improvement and find new and better ways of doing things. To embrace change and learning. To promote ideas that create value and enhance the Interdean experience.

DILIGENT

To spend time to fully understand the needs of our customers and the requirements of each situation. To pay attention to details and perservere in the pursuit of excellence.

OUR COMMITMENTS TO 10 UNGC PRINCIPLES

PEOPLE - SOCIAL SUSTAINABILITY

- PRINCIPLE 1: SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED
 - **HUMAN RIGHTS**
- PRINCIPLE 2: MAKE SURE THAT WE ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES
- PRINCIPLE 3: SUPPORT FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING
- PRINCIPLE 4: SUPPORT THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR
- PRINCIPLE 5: SUPPORT THE EFFECTIVE ABOLITION OF CHILD LABOUR
- PRINCIPLE 6: SUPPORT 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 organization and those with whom we interact.
- Compliance with national legislation.

PLANET - ENVIRONMENTAL SUSTAINABILITY

- PRINCIPLE 7: SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES
- PRINCIPLE 8: UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY
- PRINCIPLE 9: ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENT 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.
- Reuse 100% of packing material where quality is not compromised.

PROFIT - FINANCIAL SUSTAINABILITY

PRINCIPLE 10: 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.

CONDUCT

Santa Fe launched a *Managers Code of Business Conduct* in 2012, which outlines how Managers should deal with ethical dilemmas and how they can assist and guide their staff in remaining compliant to Santa Fe's policies. Continuing with this, 100% of Managers made an annual declaration reaffirming their commitment to Santa Fe's business conduct. In 2013, the recipients of the Managers Code of Business Conduct was extended to Santa Fe's middle management team and in 2014 extended to those working in sales, visa and immigration, human resources and finance.

Santa Fe's first Code of *Business Conduct, Staff Guidebook* launched in 2013 formally became part of Santa Fe's Welcome program in 2014 as a mandatory part of each employee's induction at Santa Fe.

The Code contains global requirements of both the Company and all employees to comply with good business ethics and fulfil our stake-holders' expectations including compliance with the ten Principles of the UN Global Compact. Screencasts were also made available to employees via The Academy Online discussing the UNGC Ten Principles.

In 2015 we will continue to collect annual declarations relating to the Managers Code of Business Conduct. In order to strengthen and support each employees understanding of dealing with ethical dilemmas we plan to expand our range of learning resources available to employees via The Academy Online.

PEOPLE, LEARNING & CULTURE

At Santa Fe we recognise that the communities in which we work are diverse and continue to promote diversity in all our offices. Our employees are at the heart of our activities and they represent our most precious asset. We make it our goal to continue to develop our workforce by investing in their training, and promoting equal opportunities regardless of gender, age, origin, sexual orientation, disability, religion or other cultural status.

Our *Code of Business Conduct, Staff Guidebook* outlines our approach to how we treat employees in particular to fair pay, fair labour, fair training & development, fair opportunities and confidentiality.

Training and development

2014 was an exciting year for Santa Fe's People, Learning and Culture (PLC) development. Investment was made to strengthen the PLC team which saw the hiring of a learning, development and talent manager and dedicated PLC heads in each region to support the Group's Director of People, Learning and Culture. The team's objectives include implementing a consistent approach to performance management to help provide more focus on objectives, more career development opportunities as well as enhanced blended learning solutions for employees at all levels of the organisation.

The 'Managing @ Santa Fe' program was pilot launched in 2014, designed to create a consistent management fundamentals learning program. The program will be rolled out globally in 2015.

Santa Fe launched the Perfect Relocation globally in 2014, Relocation Managers from around the globe met in Dubai, United Arab Emirates with the sole goal of working toward implementing and delivering the Perfect Relocation methodology to establish a more consistent and customer focused service. The core philosophy of the Perfect Relocation is based on our core values of Quality, Efficiency, People, Safety, Respect and Ethics meaning that we always deliver the highest service standards to our clients at the right price. It was a positive event where employees exchanged knowledge about their jobs but also valuable cultural exchanges.

Our annual sales conference took place in Budapest, Hungary with a "Perform to Win" theme. The conference included a high pressure teambuilding exercise where teams worked together to build, pack and label boxes to strict specifications for "customer" approval.

Australia held the 'Top Gun' training program in 2014; sales professionals from around the country were enthusiastic, engaged and embraced all aspects of the insurance sales and sales techniques training.

We saw a 25.5% increase in formal classroom based training hours in 2014 which resulted in an average of 13.7 hours per employee. To compliment this 2014 was also an extremely positive year for employees engaging with The Academy Online with 95% of staff participating in e-learning resources and cultural exchanges.

Social events

In order to create a good working atmosphere, we uphold a tradition of organising social events on a regular basis such as company parties,

team-building activities, family days and cultural events. This tradition is an integral part of our company identity and local events are communicated to all staff via the Company newsletter published on a quarterly basis.

Diversity

Monitoring gender ratio is an important indicator allowing us to ensure that we are an attractive employer to both male and female prospective and current employees. The female gender ratio increased in 2014 for the Senior Management as well as the overall work force.

Turnover

Retaining employees remains an important aspect of our business; our goal is to remain an attractive employer communicating, 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. The absolute turnover saw a slight decrease from 2013.

HEALTH AND SAFETY

Keeping our people, facilities and any place we do business safe continues to be a fundamental part of operations at Santa Fe. Managing our safety risks also keeps our community neighbours, customers and employees secure and helps us create a more sustainable company. We have implemented Occupational Health and Safety Management systems across our business. Our OH&S programs are integrated into the way we do business.

New employees are informed about our safety guidelines, and how to identify, evaluate and appropriately act upon dangers and risks. Unfortunately, not all accidents or injuries can be avoided, which is why we closely monitor and report each incident, evaluate and implement improvement and preventative measures where appropriate. At Santa Fe Health and safety awareness has increased and offices around the world have launched local initiatives to promote good health and wellbeing for employees – from sessions about best practice tips to sitting at a desk, manual handling maintaining a balanced diet.

A dedicated Health & Safety community has been created via The Academy Online, where employees can share best practices, local initiatives and engage with training material.

Our Indonesia team is spotlighting the need to be healthy and fit with "Thursday Afternoon Aerobics" held for staff in the office. The Indonesia team invited a professional aerobics instructor to facilitate the classes on a weekly basis.

Our team in Singapore also launched a Workplace Health Promotion Programme for staff. The Team organized a 5km Fun Walk, which took place on a scenic path between Marina Bay Golf Course and Marina Barrage in Singapore.

FACTS ON PEOPLE



AT SANTA FE WE RECOGNISE THAT THE COMMUNITIES IN WHICH WE WORK ARE DIVERSE AND CONTINUE TO PROMOTE DIVERSITY IN ALL OUR OFFICES. OUR EMPLOYEES ARE AT THE HEART OF OUR ACTIVITIES AND THEY REPRESENT OUR MOST PRECIOUS ASSET. WE MAKE IT OUR GOAL TO CONTINUE TO DEVELOP OUR WORKFORCE BY INVESTING IN THEIR TRAINING, AND PROMOTING EQUAL OPPORTUNITIES REGARDLESS OF GENDER, AGE, ORIGIN, SEXUAL ORIENTATION, DISABILITY, RELIGION OR OTHER CULTURAL STATUS.

CORPORATE CITZENSHIP

2014 CORPORATE COMMITMENTS

Santa Fe Group financially contributes towards three main charities and saw a total contribution of USD 177,347 in 2014.

Our Asia region contributed USD 5.00 per booked move to Johns Hopkin Medicine in Baltimore, Maryland. Johns Hopkin is one of the world's pre-eminent health care institutions, and its researchers have made a tremendous contribution in deciphering the mechanisms of cancer and discovering new treatments.

EMEA Region contributed USD 5.00 per booked move to Bertram's Junior School in Johannesburg, South Africa which is a Charity set up to help make a difference to the lives of its children many of whom have had their family lives destroyed by conflict or by social disasters like HIV/ Aids. These donations will help to develop a school expansion and to provide necessities such as books and food for the students.

Australia region contribute to Red Kite, a charity that supports children and young people with cancer. Red Kite support services include financial assistance, emotional support and educational assistance. Australia contributed AUD 5.00 for every international outbound relocation performed.

LOCAL ENGAGEMENTS

At Santa Fe we believe in supporting our local communities and charities that make our communities stronger. And when we work together, we enhance lifestyles, improve education and benefit our environment. Our community involvement is driven at the local level, where our offices make decisions on how we should invest our time and financial resources. By supporting our communities, we create a sustainable future for Santa Fe, our employees, business partners and our communities at large.

Coming together to bring relief

In the aftermath of floods in August that killed more than a hundred people and left thousands homeless in Northern India and Nepal our team in India contributed to the relief effort by contributing money to buy more than a hundred blankets, as well as tents and clothes. Our team also contributed money to a local NGO, which supported victims by sending relief materials to victims in Srinagar. In support of their efforts, logistical support was provided to transport material from various

collection points and deliver to their central collection hub. Two staff members volunteered to go on a five day trip driving a truck from New Delhi to Srinagar in Northern India to make the delivery.

Supporting health advancements

Our Middle East offices in Qatar, Abu Dhabi and Dubai wore pink in support of the 'Pink Walkathon' on 31 October in Dubai's Zabeel Park. The event raises awareness and funding to support breast cancer patients. The 'Pink Walkathon' is one of the region's largest charity events supporting breast cancer. The walkathon helps by educating and empowering women in the fight against breast cancer.

In support of the Marie Curie Cancer Care organisation, our London team took to the water and hit the roads on the bike and on foot in the Humanrace triathlon relay at Dorney Lake in May to raise money for Marie Curie Cancer Care. The team raised more than GBP 800 for Marie Curie at the event.

The Santa Fe Group sponsored the Jumeirah Primary School (JPS) Spring Fair in February. The fair is a popular family and fun-filled annual charity event that attracts many in the local community of Dubai to the school's playground. Santa Fe sponsored all the stalls at the event and Santa Fe employees hosted games and giveaways. This important charity raised money for Medicine Sans Frontiers (Doctors without borders), which delivers emergency assistance to people around the world affected by conflict, malnutrition, natural disasters and those without basic healthcare.

Our team in Australia completed 'The Age Run Melbourne' in late July to support Redkite, a cancer charity providing essential support to children, young people and their families. Staff from our Melbourne team completed an impressive 22km walk/run to raise money for the charity and finished in excellent form, with many achieving new personal bests and some even running the whole 22km for the first time! The team raised AUD 1089 via donations and sponsorships.

Our Perth branch organised a Car Rally Treasure Hunt to raise funds for Epilepsy Action, a provider of specialist epilepsy services for people with epilepsy and other seizure disorders, their caretakers, families and the broader community. The team raised and donated AUD539 to the organisation.



SANTA FE FUN RUN – 11TH ANNIVERSARY

Santa Fe Group sponsored its 11th Anniversary Fun Run in Orlando, Florida where the Fun Run was held alongside the International Association of Movers (IAM) Conference. Attendees were also invited to attend the Red Horse Cocktail Party where further donations were collected. All the proceeds and money raised were donated to Johns Hopkin cancer care.

Supporting future generations

Employees joined Santa Fe's CEO to visit the EAC Santa Fe Laoling Hope School, China which was built by Santa Fe in 2006 through donations. The school is visited on an annual basis where equiptment is donated. This year was an especially important year as a kindergarten was added to the school and building work began to create a new wing. The school's grades at graduation are above the national average and the school has just graduated it first students who are now on their way to university. We believe this is an excellent achievement in the eight years since the EAC Santa Fe Laoling Hope School first opened its doors to the children of this community. On this trip 15 computers were donated to continue to support the students in their studies.

The Priory Lodge School is a purpose built day school in London, United Kingdom for children up to 19 years old with mild to moderate autism, Asperger's syndrome and associated learning difficulties.

Santa Fe's Group Marketing team spent a day with the staff at the school sweeping, painting benches and doing other general maintenance work to help the school prepare for the new term. The team also purchased waste bins, hanging flower baskets and paint to improve the appearance of the school.

Our London team organised a Pyjama/ Onesie day in November to support the BBC Children in Need charity which helps change the lives of disadvantaged children and young people across the UK.

Our team in Thailand and charity organization Gift of Happiness Foundation coordinated a day of fun, games and gifts where nearly 100 underprivileged students received new clothes and school supplies and enjoyed ice cream and games. The fun day took place in September at the Wat Sam Makan Primary School, by the Pa Sak River Mea La, Ayutthaya.

Our Beijing office played a pivotal role in supporting Roundabout, a local social enterprise that runs a charity store and distribution centre and an annual book fair series held throughout the spring. The team donated

more than 400 Records Management cartons to Roundabout for filing and storing the numerous book donations they collect throughout the year. Roundabout previously used random packing boxes ranging in all sorts of shapes and sizes. Now with the Santa Fe Records Management boxes, they are finding they can organize their book stock more efficiently. The team also provided trucks to help move the books from their warehouse to various International Schools around Beijing where they hold book fairs. With our support, Roundabout raised more than RMB 250,000 in support of various charities and causes around Beijing and China

Environmental engagements

Our team in Indonesia participated in 'Clean Up Jakarta Day', an event inspired by the indnesian tradition of "Gotong Royong", or communal work, by picking up rubbish and cleaning up Jakarta. This annual event is hosted by Indonesia Expat and is designed to educate citizens about the impact of littering and spark awareness of the importance of recycling. Our Indonesia team volunteered to help out during the day and helped transport recyclables to the Jakarta Green Project in East Jakarta.

Our team in Taiwan donned their rubber gloves and hit the trails in the Neihu Ridge Scenic Area outside the city to clean and remove litter. Fifteen staffers participated in the clean-up and picked up more than 80 kilograms of garbage.

Animal Sanctuary Trust Indonesia is a non-profit organization that rescues, rehabilitates and releases Indonesia's endangered wildlife. ASTI is developing a project to raise awareness about the need for tiger conservation. They had an idea to make a mobile "environmental education school" in the form of a van equipped with all kinds of interesting materials about conservation and endangered species.

To assist, our Indonesia team donated one of our old trucks in October so ASTI could travel from village to village and school to school giving short interactive presentations

REDUCING OUR ENVIRONMENTAL FOOTPRINT

CERTIFICATIONS AND MANAGEMENT SYSTEMS

Reducing our environmental footprint means more than just complying with industry laws and regulations. Environmental stewardship is a pillar of our sustainability program and a serious commitment that goes to the heart of our business operations.

Managing our activities responsibly relies on a management culture founded on Santa Fe's vision and values, on the efficient and responsible management of the Group's tools and resources, but also on extensive experience of long-standing relationships with stakeholders.

As a responsible company, Santa Fe makes investments in environment management to control the risks linked to its activity and to improve its environmental footprint.

Santa Fe applies recognised Environmental Management Systems such as ISO 14001:2004 (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.

WASTE

Santa Fe's approach to waste consist of the Reduce, Reuse, Recycle philosophy. Reducing the amount of material used where possible, reusing packaging materials where quality is not compromised and recycling waste.

Santa Fe continues to seek new sustainable materials, last year we reported success on the piloted Enviro Wrap scheme in Australia. In 2014 Santa Fe continued to test the suitability and durability of Enviro Wrap. It has been established that whilst Enviro Wrap boasts significant environmental benefits it cannot fully replace the use of cartons and other packing materials. We will continue to use Enviro Wrap where it is suitable to do so.

Santa Fe offices also have various processes in place for reusing packing material such as cardboard boxes, bubble wrap and wooden crates. In many locations these are reused either as packing material, or donated to local charitable events.

In 2014, we saw a significant increase in recycling. The UK saw the biggest increase in the amount recycled due to the partnership program with their packing supplier where all waste is collected and recycled back into packing material. This complimented a reduction in the amount of waste sent to landfill and for incineration.

SUSTAINABLE WAREHOUSING

Hong Kong Warehouse

2014 saw the opening of a new warehouse in Hong Kong. The facility boasts a number of environmental benefits such as LED lighting, designated recycling points, air conditioning storage area with timer controls built in with pre-set temperatures, waste producer system and skylight roof panels.

ENERGY

Energy consumption is an important area of our environmental program and we are always seeking new ways in which we can reduce the amount of energy we consume across all our locations. Over the years offices have made a number of changes to our facilities to enable us to be more energy efficient. These have included raising awareness with employees, investing in energy efficient lighting and seeking alternative energy sources but to name a few.

Road transportation continues to be a major environmental impact area for Santa Fe as such we have identified various initiatives to help us reduce our impact on the environment via increased efficiency management of our fleet.

The centralised trucking department in Europe continues to increase its efficiency reducing the number of empty trucks and consolidating road trips to reduce the number of our trucks on the road thus reducing our emissions.

This has been such a success that in key hubs across the Group centralised freight departments have been formed allowing the consolidation of freight aiding in reducing the number containers and allowing customers to benefit from sharing freight costs.

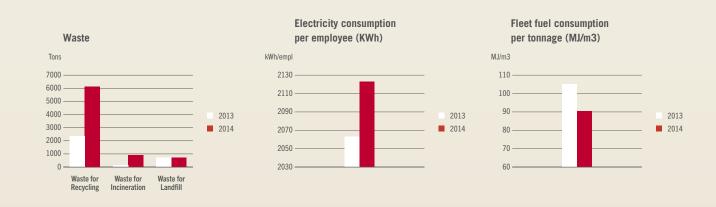
A 13.9% decrease in the fuel per tonnage was a positive and encouraging result. The results are a reflection of the consolidation of road shipments where possible, increased collaboration between offices, more efficient transport planning and a significant improvement in the quality of the data being

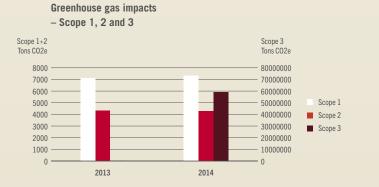
GREENHOUSE GAS EMISSIONS

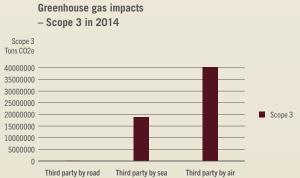
Santa Fe has continued to monitor its GHG emissions. We continue to work with our offices globally to improve the data quality to allow better and more in depth reporting of our Scope 1 and 2 GHG emissions. Fuel continues to be Santa Fe's biggest contributor to its Scope 1 and 2 emissions and we are committed to working on initiatives and ways in which we can reduce the impact of our fleet.

In 2014, Santa Fe begun to collect data to allow reporting of relevant Scope 3 GHG emissions. At this time the data excludes third party air and ocean shipments booked by our Australian offices. In 2015 Santa Fe shall collect data relating to moves booked by our Australian offices so that we may to provide a better indication of our overall relevant Scope 3 GHG emissions impact.

FACTS ON ENVIRONMENTAL FOOTPRINT







REDUCING OUR ENVIRONMENTAL FOOTPRINT MEANS MORE THAN JUST COMPLYING WITH INDUSTRY LAWS AND REGULATIONS. ENVIRONMENTAL STEWARDSHIP IS A PILLAR OF OUR SUSTAINABILITY PROGRAM AND A SERIOUS COMMITMENT THAT GOES TO THE HEART OF OUR BUSINESS OPERATIONS.

RESPONSIBLE BUSINESS – AND OUR SUPPLY CHAIN

In our Code of Conduct, Santa Fe expresses its commitment to responsible behaviour and integrity, taking into account the sustainable growth of its business, and its good reputation in the communities in which it operates.

Santa Fe has a strong commitment to be in compliance with all relevant laws, including anti-corruption laws and more specifically the UK Bribery Act.

Santa Fe has a zero tolerance approach towards corruption in all its forms. All Santa Fe employees are expected to promote a culture based on ethics and compliance.

To support its commitment, Santa Fe as part of its Managers Code of Business Conduct and Code of Business Conduct, Staff Guidebook has adopted and deployed a Gift, Entertainment and Anti-Bribery Policy, a Conflicts of Interest Policy and an Anti-Facilitation Payment Policy.

WHISTI FBI OWING

Santa Fe's Whistle-blower program encourages employees to take up any difficulty or question relating to the application of the Code of Conduct with its hierarchy and other identified interlocutors in a confidential manner. The Whistle-blower system is aimed at identifying corrupt practices or suspected violations of laws and regulations, extortion, fraud, bribery and other forms of corruption or ethical concerns.

DATA SECURITY

Santa Fe continues to follow the requirements of ISO 27001 Data Security Management to ensure that all data and information that interacts within our Company is secure. Santa Fe undergoes regular audits via certification bodies, internal audits and also audits by our corporate customers. ISO 27001 is the internationally recognised standard for establishing, implementing, maintaining and continuously improving Information Security Management. It demonstrates our ability to deliver secure reliable solutions for both Santa Fe and our customers and 11 locations have received formal certification to ISO 27001.

Santa Fe demonstrates an ability to efficiently handle data through robustly managed processes. By achieving and maintaining certification it has allowed us to strengthen the levels of trust between ourselves and our customers, improving our ability to securely manage their data and at the same time providing assurances that we are following ISO 27001 information security best practice.

SUPPLIER PROGRAMS

Santa Fe's Service Level Agreement and Suppliers Code of Conduct detail the minimum performance requirements expected of anyone who does business with us, in accordance with the 10 Principles of the UNGC. 100% of business agents confirmed their commitment by signing the Service Level agreement.

Santa Fe has specific minimum requirements regarding

- · Health & Safety
- Accidents
- Data Security
- Environment
- · Child Labour
- Forced Labour
- · Compensation & working hours
- Non discrimination
- Anti-corruption

Anti-corruption and health & safety

Santa Fe continues to provide eLearning training courses to our supply chain on the UK Bribery Act. This is a mandatory requirement for all our business agents.

In addition to mandatory training our business agents are required to provide quarterly declarations to Santa Fe Group. The declarations require a declaration about whether there were any instances of corruption within their organisation and the details of any such instances. Our business agents are also required to declare any work accidents that occurred on any Santa Fe job. We believe these important aspects of maintaining an open and transparent relationship with our business agents allows mutual sharing of ethical and sustainability beliefs.

In 2015 Santa Fe shall continue to partner with suppliers to ensure that through partnership, shared experiences and training mutual contribution and commitment to the ten UNGC Principles are reflected in all that we do. To support this Santa Fe shall be launching a new eLearning training course for suppliers on Anti-Bribery and corruption.

We believe that an open and honest dialogue will benefit our Stakeholders as well as our Corporate Social Responsibility efforts, and we invite you to participate. Feel free to contact us with any questions or comments on certification@thesantafegroup.com