



**SANTA FE
GROUP**



WE SUPPORT



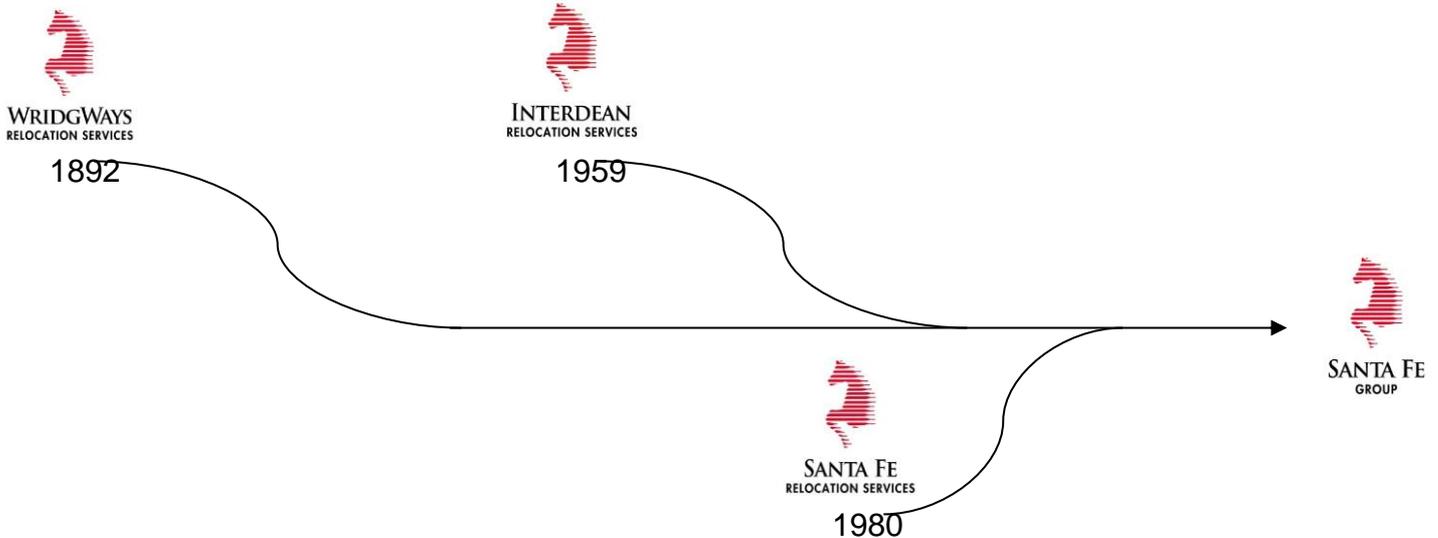
**UN GLOBAL COMPACT
COMMUNICATION ON PROGRESS IN**

2012

COMMUNICATION ON PROGRESS REPORT 2012

SANTA FE GROUP





Statement of continual improvement

The Santa Fe Group is delighted to present its third Communication on Progress report in support of our continued commitment to the 10 UNGC principles.

The Santa Fe Group has gone through many changes in the past 3 years with the acquisitions of Wridgways in Australia and Interdean in Europe. As our global footprint expands, so do our business activities.

We recognise that long-term sustainable growth is only possible if our services represent an inherent good to our clients and only if the possible negative impact of these services can be avoided or minimized. We have spent the last 12 months focusing on collecting information about our CSR business activities and implementing consistent reporting across all areas of the business. Investment in data collection by means of a software package used across locations allows us to truly see how we are performing and identify areas where improvement is needed.

A key highlight of 2012 was the integration of 6 European offices into our CSR programme. Self assessments were completed allowing offices to assess their individual performance. In 2012 the Santa Fe Group continued to demonstrate our commitment to the communities in which we do business, and a number of charity events took place to raise money for causes.

We held a number of training conferences to bring staff together to share ideas and best practices. We are delighted to also confirm the appointment of a Group Director of People, Talent and Culture, who has started working on a number of projects to increase learning throughout the company via the Santa Fe Academy.

In the Santa Fe Group we want to be part of the solution for environmental change and our plan for 2013 will be to really drive some of the great initiatives that have been implemented in some of our operations such as trucking route planners. In addition we will be giving our clients the opportunity to offset carbon emissions associated with their relocations.

We continue to combat corruption and in 2012 we released a Code of Conduct for all managers accompanied by an eLearning module on anti-corruption. In 2013 we intend to release an employee manual covering business ethics within the Santa Fe Group. We understand that in order to truly be part of the campaign against corruption we must extend our values to our supply chain and in 2013 we will be providing anti-corruption training to companies that do business with us.

The UNGC principles will continue to act as a guide, an inspiration and an aspiration to help create a sustainable future. The Santa Fe Group will continue to drive forward its commitment to the UNGC guided by its own longstanding values of trust, honesty and integrity.

We hope you enjoy reading the report and look forward to communicating our progress next year.



Lars Lykke Iversen
CEO of Santa Fe Group

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6. Anti-corruption



OVERVIEW

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 effective abolition of child labor
 Principle 6: Support elimination of discrimination in respect of employment and occupation

Commitment & targets	Guidelines & Systems	Actions	Status/ Results
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 Ensure that all middle managers and above complete the eLearning modules on anti-discrimination and corruption Continue to reduce work-related accidents Work towards reducing employee turnover	Business Code of Conduct	All managers to sign the Business Code of Conduct	Achieved
	Supplier Code of Conduct	85% of major suppliers to sign the Supplier Code of Conduct	In progress
	Grievance mechanism and whistleblower system	Formally release the grievance mechanism and whistleblower system throughout European offices	In progress
	Sofi data collection system	Ensure management are engaged in CSR activities	On going
	eLearning anti-discrimination module	Create a Health and safety virtual team to promote and educate staff on health and safety matters	In progress
	Health and Safety policies and management systems	Director of People, Culture and Talent to put in place career progression plans, training and other initiatives to retain staff.	In progress

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

Commitments & Targets	Guidelines & Systems	Actions	Status/ Results
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.	ISO 14001, environmental management systems. Group Environmental Policy Sofi data collection system	Standardize key ISO environmental objectives across the Group.	In progress
Reduce carbon emissions.		Internal and External audits to measure compliance to 14001 and adherence to UNGC principles	Ongoing
Implement a voluntary programme to allow clients to offset Carbon emissions on their relocation.		Create an Environmental virtual team to promote and educate staff on environmental matters.	In progress
Ensure as a minimum Euro 2 norm for trucks by end of 2013		Communicate off-setting emissions to clients and create an online payment facility	In progress
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.

Commitments & Targets	Systems	Actions	Status/ Results
Apply a zero tolerance approach with respect to corruption, extortion and bribery. Continuously identify ways of maximizing 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. Managers to complete eLearning training modules on anti-corruption	Financial audits		
	Code of Business Conduct	Signed by all Managers	Completed
	Employee Code of Conduct	Employee awareness campaign on business ethics to be launched.	In progress
	Supplier Code of Conduct	Supplier engagement in CSR.	In progress
	Whistleblower system	Roll out whistleblower system in Europe	In progress
85 % of major suppliers to sign the code of conduct	eLearning anti-corruption module	Management engagement in CSR activities	In progress
75 percent of external suppliers to undergo anti-corruption training.	Sofi Data collection system		

PEOPLE - Social Contributions

The Santa Fe Group remains active in a variety of ways in support of community events and charitable organizations. We believe that, in supporting charities and community events, we not only improve the communities and world we live in, we also motivate staff and create goodwill.

The Santa Fe Group sees itself as a company that can provide not only financial contributions but also time, expertise, resources and experience to our communities.

The community organizations supported by the Santa Fe Group include women's groups, crisis help lines, international schools, amateur arts organizations, non-profit organizations sports leagues, Oxfam, Marie Curie Cancer Care, The Johns Hopkins Research Fund which focus on the treatment of breast cancer care.

In 2012 the Santa Fe Group continued its commitment to Cancer Research, Santa Fe Asia and Australia contributed USD 5.00 per move performed to Johns Hopkins Research Fund raising USD 94,795. Santa Fe also organized a fun run to raise money for John Hopkins which contributed a further USD 21,068.

In Europe money is raised and logistical services are provided to Marie Curie Cancer Care including a charity box scheme collecting unwanted household goods for distribution at Marie Curie's national network of shops.

In 2013 Santa Fe Asia and Interdean Europe will contribute USD 5.00 to Bartrams School for every relocation performed. The money raised will be used to expand the school's grounds so that children can continue their education up to the seventh grade instead of the current fourth grade.

WridgWays Australia will be supporting Red Kite, a charity that supports children and young people with cancer. Red Kite support services include financial assistance, emotional support and education assistance. WridgWays will contribute USD 5.00 for every international outbound relocation performed.

The Santa Fe Group is also a proud sponsor of the Foundation for Social Change, a not-for-profit organization whose primary purpose is to improve the lives of impoverished women around the world.

The Santa Fe Group's commitment to our communities 2012

Breast cancer research

Santa Fe Hong Kong walking for Breast Cancer Research

In October 2012 Santa Fe Hong Kong participated in the Pink Walk for Breast Health 2012 – an annual walkathon organized by the Hong Kong Breast Cancer Foundation (HKBCF) for making bigger strides in eliminating the threat of breast cancer USD 12,290 was raised for the organization. Staff wore specially made pink Santa Fe T-Shirts to mark the occasion.

Santa Fe Dubai walking for Cancer Research

In November 2012 Santa Fe Dubai participated in The Burjuman Pink Walkathon in support of Breast Cancer Research. Over 13,000 people attended the event to raise awareness.



Children's rights and welfare

Santa Fe employees support local community school in Phuket Thailand.

Approximately 100 Santa Fe employees took part in a community project, working with 60 children from the Tessaban Muang Phuket School in Thailand.

Employees from across Santa Fe's Asia Pacific, European and Middle Eastern offices, who had travelled to Thailand for the company's Asia Pacific strategic meeting, spent the final day working with the children.

The children, aged 9-11 years received donations and books from the Santa Fe Group which will be used to help in their development. The Santa Fe Group's staff and the children took part in team-building exercises which encouraged teamwork, social development and language training.



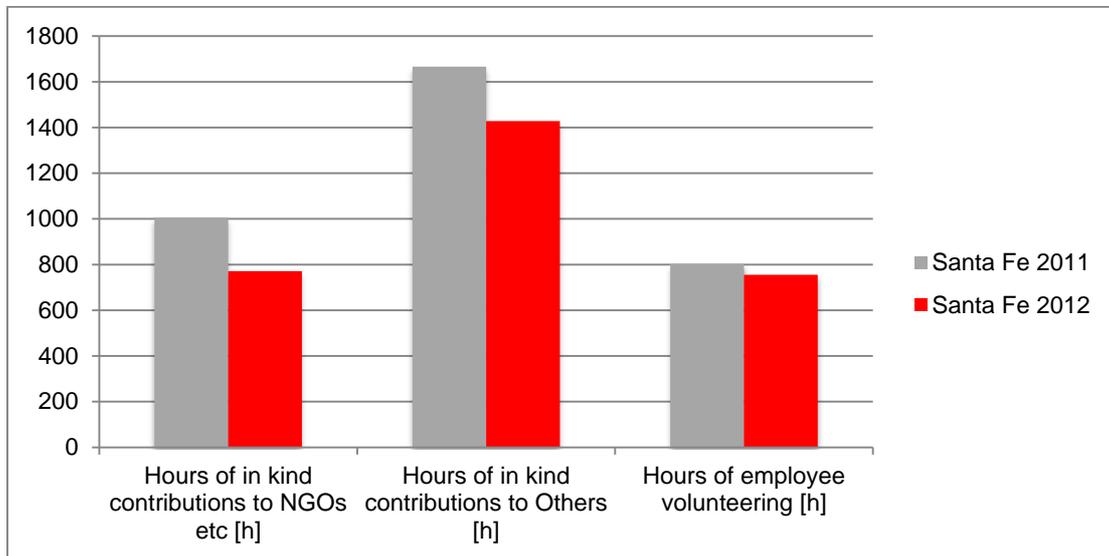
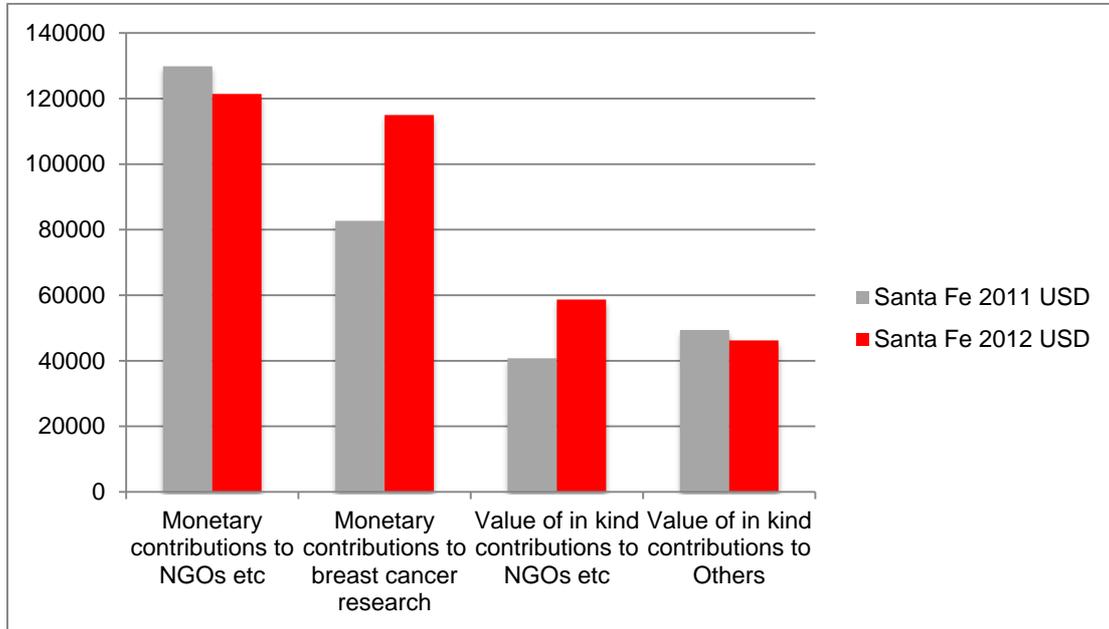
Santa Fe New Delhi has been associated with the NGO Sahara for the past 3 years. Sahara provides care and support to substance users. It also runs an informal school for under privileged children and a home for destitute women. The new Delhi office regularly donates wood pieces and plywood which is recyclable waste generated from the Art Carpentry Dept. The wood is used for various purposes (at times even burnt to keep them (who?) warm during the long and cold winter).

This year employees suggested that we can help train the men undergoing rehabilitation to make some useful things from the wood that was donated to them. Our carpenters conducted a 1/2 day workshop where they trained them to make small items like benches and stools.



PEOPLE: Social contributions *Continued*

In 2012 Santa Fe Group employees contributed more than 755 hours to volunteering, and monetary contributions of USD 121,000 to NGOs. More details about contributions are provided in the charts below.



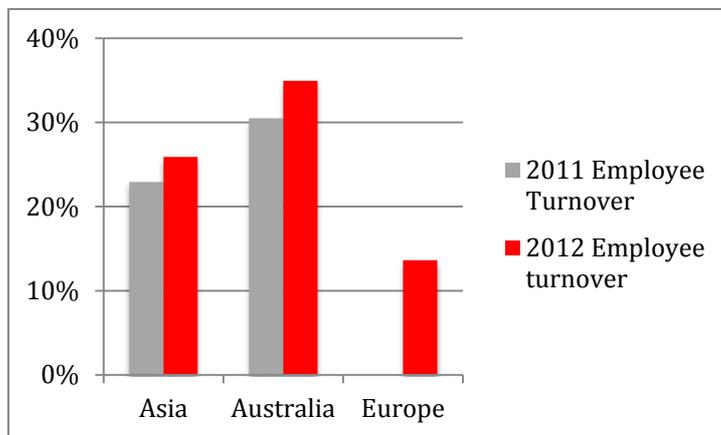
PEOPLE: High standards for high quality service

The Santa Fe Group positions itself within the industry worldwide as an attractive employer capable of recruiting and retaining top quality employees. The Santa Fe Group works to ensure good working conditions for all employees and strives to be an exemplary employer.

To maintain high quality standards that result in employee satisfaction and low employee turnover, Santa Fe supports a work environment conducive to good health. The Santa Fe Group strives to be the employer of choice for 2,683 employees. This includes respecting and supporting internationally proclaimed human rights including the basic principles of the International Labour organization's Declaration of Fundamental Principles and Rights at Work.

Turnover

The average employee turnover increased again in 2012. Similar trends from 2011 were observed with high employee turnover rates in Asia and Australia.

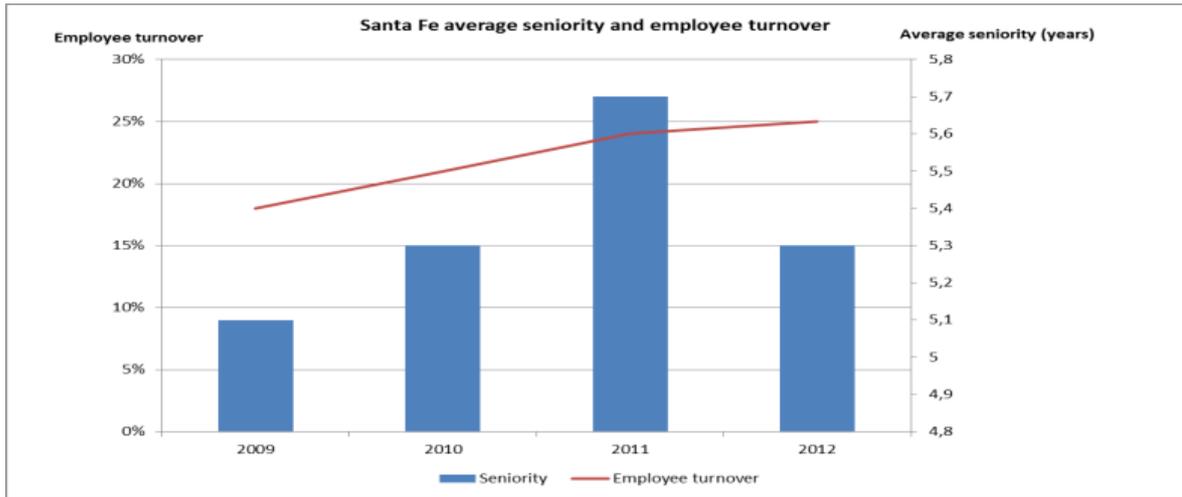


Locations such as China, Singapore and Korea continue to yield high employee turnover rates where English speaking abilities are in high demand. Australia continues to yield a high turnover whilst this is a market where employee turnover is generally high. We hold it a high priority to reduce the employee turnover. In 2012 Santa Fe Group confirmed the appointment of a Director of People, Talent and Culture to deal with these challenges and further develop our employees.

Employee feedback is invaluable to Santa Fe. Many offices have a suggestion box whereby feedback can be given to the Company.

For the third year Interdean London participated in the 'Best Companies Awards'. Employees at all levels complete questionnaires which are designed to measure employee commitment. Interdean London were awarded a 'One to Watch' status.





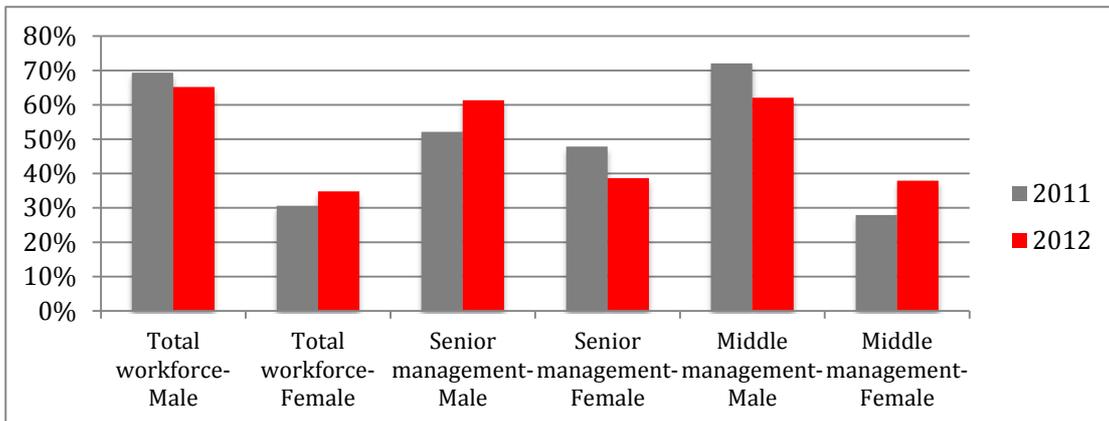
Diversity

Whilst the moving and storage industry remains mainly male dominated, Santa Fe believes in equality; treating staff fairly regardless of their gender. New members of staff and managers are recruited exclusively on the basis of their qualifications and experience.

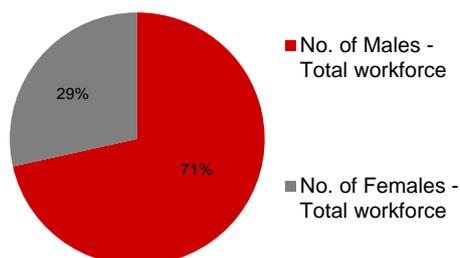
Skills, performance and ethical conduct are our only indicators of employee qualifications. Santa Fe will not tolerate discrimination with respect to gender, race, age, religion, age, disability, sexual orientation, national origin, social status or any other protected discrimination grounds.

The percentage of female employees increased by 4% in 2012 compared to 2011 and we hope to continue to see an increase in the gender ratio in the years to come.

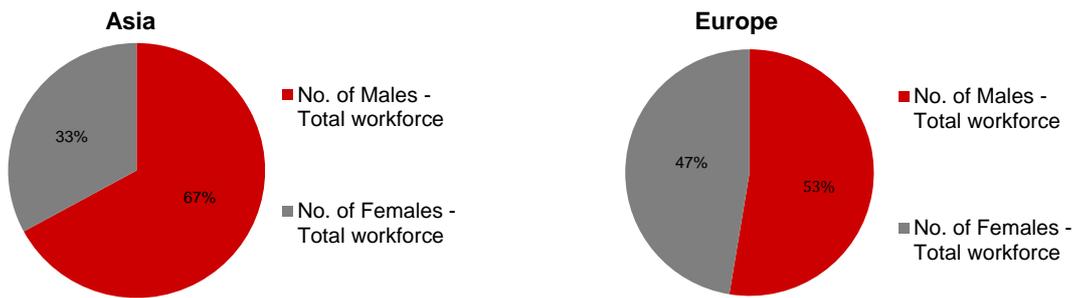
Santa Fe Gender Ratio



Australia



On closer observation of the data whilst the Santa Fe Group showed an overall increase of 4% this is predominately due to the addition of European offices who yield a very positive gender ratio. Our operations in Asia and Australia employ packing crews, which make up a large proportion of the male workforce, whereas in Europe this role is subcontracted.



Training

A wide range of personal and specialised training provisions enable employees to improve their knowledge and skills allowing for personal and professional development. The Santa Fe Group is committed to on-going training of all employees and consistent delivery of a 'first class service'. Quality can only be achieved through a proactive, managed training and development programme. Induction programmes for all staff regardless of position and ongoing training typically includes training in the following areas:

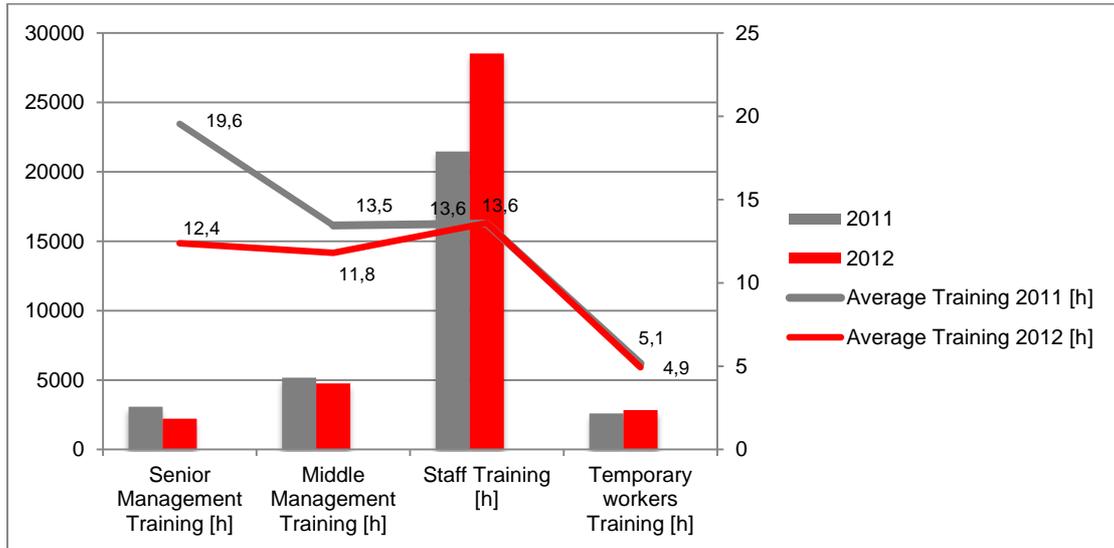
- Health and safety training and procedures
- Quality programmes and policies
- Human Resource issues including, but not limited to, discrimination, corruption and data security
- Company profile/-policies
- Customer service, sales, operations, service delivery, insurance etc.
- Whistleblower and grievance mechanism
- Environmental awareness

All employees are encouraged to further their careers and development through recognised qualifications. For example there are employees studying for qualifications in areas as diverse as finance, global mobility, business administration, sales management, health and safety, customer service and real estate. The Santa Fe Group also runs exchange programmes allowing employees from across the region to experience working in another country.

In 2013 eLearning modules on non-discrimination will be released to managers in support of the Business Code of Conduct.

In 2012 Santa Fe Group employees had an average of 14 training hours per employee. This included 8,720 hours of health and safety and environmental training. In 2013 our goal will be to increase the average number of training hours per employee to 20.

Hours of Training by employee category



Training *continued*



In February 2012 over 100 employees from Europe gathered in Kiev for the annual Sales and Operations Conference. The theme chosen was 'A Learning Experience' which involved various workshops covering Relocation, Information Security, Anti-Corruption, Sales techniques, Operations and Quality.

In 2012 the focus was on staff training with the release of 'The Perfect Relocation'. Summits were held in London and Germany to bring staff together to learn and share knowledge and skills specifically relating to Relocation Services.



In November 2012 over 100 employees attended Asia Pacific Strategic Meeting in Thailand. Awards were given for outstanding performance and it was an opportunity for employees to come together to learn and share success stories.



The academy formally known as the Interdean Academy has been rebranded and is now known as the Santa Fe Group Academy which is available to all employees in the Group. The Academy now led by the Group Director of People, Talent and Culture has changed the way in which learning is done and perceived across the Group.

Academy training has become much more than face to face training sessions with our FIDI certified training staff and due to our Global footprint additional resources such as webinars, and prerecorded training videos are being utilised by staff across the world.



Health and safety

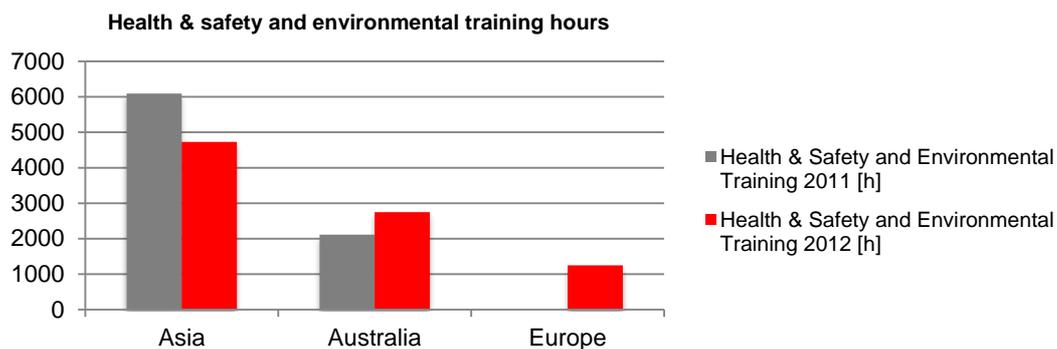
Occupational Health and Safety are important priorities for the Santa Fe Group and is actively managed by means of risk assessments and regular information to employees about avoiding accidents, illnesses and maintaining a healthy life-style.

Occupational Health and Safety is more than a set of procedures and processes at the Santa Fe Group as employees play an important role in contributing to a safe work environment e.g. reporting accidents, communicating areas for improvement and adhering to company best practices.

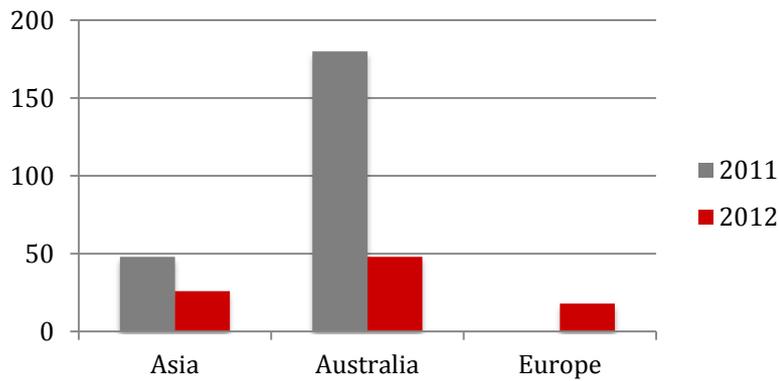
The Santa Fe Group currently has 12 offices certified to BS OHSAS 18001/ AS-NZ4801 (Occupational Health and Safety Management Systems). The Santa Fe Health and Safety policy underpins our systematic approach to managing health and safety in the workplace. Standardised processes and internal and external audits ensure that minimum standards are in place throughout the company.

Health and safety training remains an important task in the Santa Fe Group and health and safety indicators highlight the results of our efforts, for example the number hours spent on health and safety and environmental training increased in 2012.

8,720 hours were spent on H&S and environmental training in 2012.



Number of work accidents



In 2012 better recording of data saw consistent accident reporting throughout the Group. Our goals for 2013 will be to reduce work place accidents. This will be driven by the virtual health and safety committee and will consist of monitoring safety in the workplace by means of risk assessments identifying trends in accidents and preventative action plans. The number of work-related fatalities in 2012 was 0.

People targets and commitments for 2013

- Reduce staff turnover
- Reduce workplace accidents
- Average 20 hours training per employee
- Train all managers on the issue of non-discrimination and equal opportunities
- Create a virtual Health and safety team

PLANET

Group wide guidelines

Our actions are guided by our group-wide environmental policies. At present Santa Fe Asia, Interdean Europe and Wridgways Australia all have separate environmental policies implemented within their respective companies.

Our goal in 2013 will be to create and release a Santa Fe Group Environmental Policy, incorporating the policies already in place so that there is one consistent message being received by staff.

Environmental management

The Santa Fe Group complies with all the environmental regulations and standards that apply to its various offices and has implemented ISO 14001 (environmental management system) in 26 offices.

ISO 14001 certification has proved to be a useful management system allowing ownership at the executive level and contributions by all staff throughout the company. ISO 14001 certification has allowed locations to actively think about their contributions to preserving the environment and seek ways to improve.

In 2013 four offices in Europe will undergo internal and external audits to evaluate their environmental management systems and will seek ISO 14001 certification.

With the CSR software that has been implemented throughout the group we are now able to accurately record and track our environmental activities on a group-wide basis.

Promoting environmental awareness

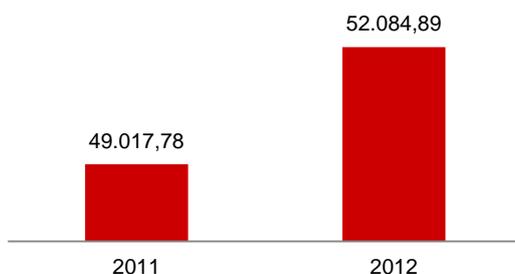
We use both internal and external communication and training to increase our employees' awareness of environmental issues.

In 2013 our goal will be to create a virtual environmental team who will drive environmental awareness within their respective locations. The team will also track and monitor trends, seek out opportunities for improvement, share best practices and implement environmental initiatives across the group.

Energy management

Potential areas for saving energy are systematically identified in many parts of the company, especially in locations that have achieved ISO 14001. The Santa Fe Group continues to work towards further reducing specific energy consumption by implementing initiatives like solar panels and energy-saving light bulbs.

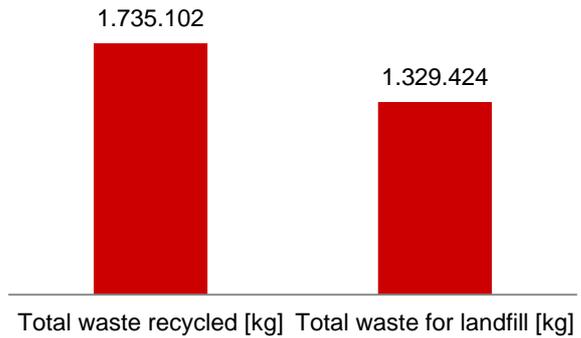
Energy consumption per employee (MJ)



Energy consumption per employee saw an increase in 2012. The increase is due to the addition of 6 European offices into the Group. We will be implementing ways to reduce the energy consumption through the virtual environmental team who will look at initiatives such as automated computer shut downs after working hours.

Material efficiency

The industry in which we operate is heavily reliant on natural resources, in particular materials such as paper, cardboard, plastic, tape etc. for office use and packing materials. The Santa Fe Group tries to make efficient use of materials reusing them where quality will not be compromised.

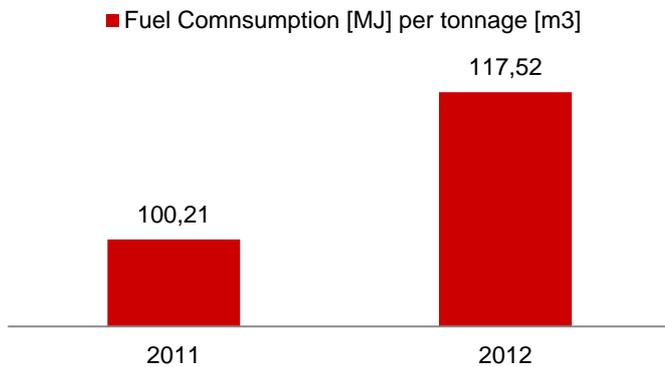


Reducing emissions

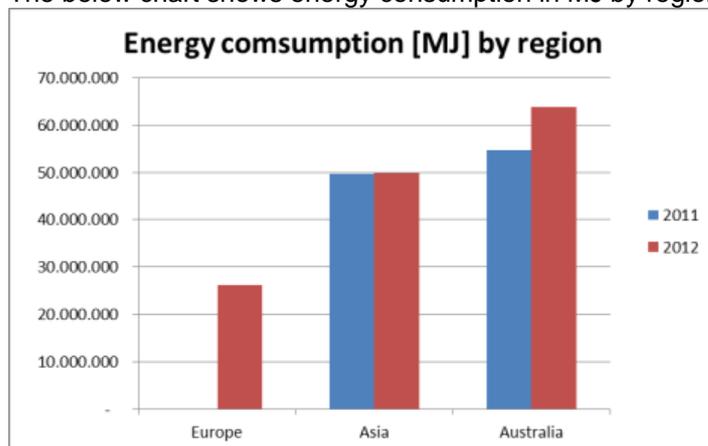
As a logistics provider with a fleet of over 678 vans and trucks in Asia, Australia and Europe, road transport is and will continue to be a major environmental impact area for the Santa Fe Group.

Interdean in Europe which relies heavily on road transportation has implemented a transport team which co-ordinates truck movement throughout Europe to consolidate shipments where possible and reduce the number of empty trucks on the road.

In 2013 we will be providing our clients with the opportunity to offset the emissions associated with their relocation. We will also be looking at ways to improve our trucking activity, ensuring that trucks and vans are at full capacity whenever possible. By enhancing our fleet efficiency we hope to reduce our emissions in the interim, our long term goal being to become carbon neutral.



The below chart shows energy consumption in MJ by region.





2013 Targets and commitments

- Implement systems to allow clients to offset carbon emissions on their relocations
- Create a virtual environmental team
- Implement environmental management systems in four European offices
- Continue to develop trucking systems to increase efficiency.

PROFIT: Financial sustainability

The Santa Fe Group considers integrity and responsible behaviour in our dealings with business partners and our employees to be fundamental values that underpin everything that we do as a company. The Santa Fe Group complies with the relevant laws and legislation as a matter of course and is against all forms of corruption including extortion, bribery and any illegal or immoral behaviour.

Code of conduct

In 2012 the Santa Fe Group published its first Business Code of Conduct for Managers. The Business Code of Conduct is designed to serve as a useful reference guide for management and staff, outlining company policies towards corruption and how to manage any situations that may arise. The Code forbids all forms of corruption including bribery, facilitation payments, extortion and also lays down further ethical requirements. It serves as a guide for Managers and aims to encourage integrity and ethical requirements and behavior. 100% of Managers read and signed the Code of Conduct.

To support the release of the Code of Conduct, an eLearning module was released to coach and train Managers on fighting corruption in all its forms. 36% of Managers completed the eLearning module.

An important goal for the Santa Fe Group in 2013 will be to release a Code of Conduct for all employees, supported by training and coaching for staff.

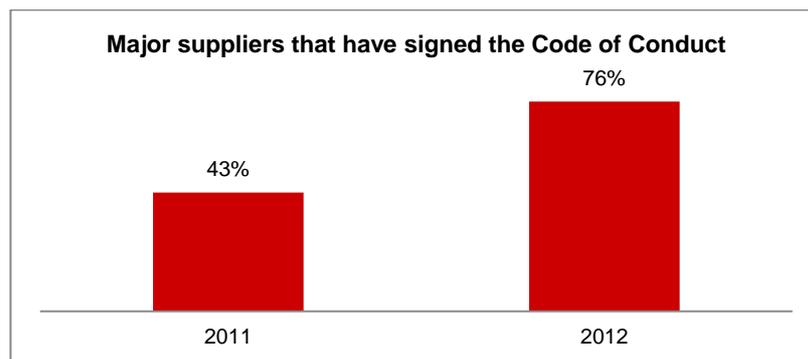
Whistleblower system

In parallel with the release of the Code of Conduct a whistleblower system was established with the purpose of managing the CSR roll out and ongoing compliance management. Employees can report incidents relating to accounting and financial irregularities, violations of laws and regulations, instances of corruption or discrimination via the dedicated hotline and/or via the confidential email address. An ethics and compliance committee was established within the organization to support the whistleblower system.

Suppliers

The Santa Fe Group expects our suppliers to adhere to the same ethical principles as outlined in the Business Code of Conduct and, as such, a Supplier Code of Conduct is in place. The Supplier Code of Conduct details our expectations of our supply chain in line with the 10 UN Global Compact Principles.

In 2012 we saw a 33% increase in major suppliers who had signed the Supplier Code of Conduct.



A key priority in 2013 will be monitoring instances of corruption in our supply chain. Suppliers will be expected to complete a quarterly declaration detailing any instances on corruption within their organization. The Santa Fe Group will also be providing eLearning anti-corruption training for businesses we work with.



2013 Targets and commitments

85% of major suppliers to sign the Supplier Code of Conduct
Release the Code of Conduct for employees
eLearning training for employees on anti-corruption and business ethics
Implement systems for recording instances of corruption in our supply chain
eLearning training on anti-corruption for suppliers.
Formally release the whistleblower mechanism to offices in Europe

For further information on the Santa Fe Group's CSR activities please contact Alan.Cartwright@santafegroup.com