LOCAL ACTION FOR GLOBAL CHANGE
Sustainability Report 2017
At Crown, we aim to do business in a way that positively impacts the communities in which we live and work. We are determined to be an asset in each of our locations, by establishing responsible policies, monitoring our impacts and continuously seeking improvements.
Crown World Mobility provides strategic assignment management for multinational companies and government organizations. Crown’s experts are available in 54 countries, supporting employees and their families on assignment and on repatriation.

Crown Relocations helps individuals and families relocate both domestically and across the world. Our Move Managers are located in 266 offices across the globe, all dedicated to providing a personal service for a successful relocation.

Crown Records Management is a significant force in corporate information management. With impressive facilities worldwide, Crown manages secure archiving and retrieval of information in physical and electronic format – helping clients maximize the value of their corporate memory.

Our care for people and important information is matched by our delicacy in handling unique, sensitive and often priceless works of art. From centers worldwide, Crown Fine Art’s experts provide planning, handling, shipping and storage services for fine art to art galleries, auction houses, private collectors and museums around the world.

Other Crown brands, Crown Wine Cellars and Crown Logistics, include more conventional logistics services from storing and managing wine collections, project management of oil and gas equipment, hotel refurbishments, warehousing and distribution of luxury goods.

With offices in 266 locations, we are loyal to our local communities and the environment. Crown leads a sincere and wide-ranging Corporate Social Responsibility (CSR) program – supporting health, education and welfare. In addition, we continually revise our efforts to improve the environmental performance of all our operations.

The Crown Worldwide Group, headquartered in Hong Kong, was established in 1965.

The Crown Worldwide Group is made up of several divisions that share a common quality – the experience and insight to accomplish anything, from the complex to the routine. Every day we help people relocate their lives, organizations manage their corporate data and art professionals handle and ship their precious collections.

Our commercial activities are balanced with compassion and responsible actions to make the world a better place for future generations. Through environmental, charitable and employee activities, Crown helps sustain itself and the communities it serves.
In March 2015 Crown joined the UN Global Compact (UNGC), the world’s largest corporate citizenship and sustainability initiative. This achievement is a result of an ongoing effort to become a more caring and sustainable business.

To reach this status, Crown’s Chairman, Jim Thompson, formally committed to the UNGC’s ten principles regarding human rights, labor, environment and anti-corruption. Crown has agreed to set goals in each of these areas and be transparent and accountable in its performance by publicly reporting its progress every year.

The following chart demonstrates how Crown’s sustainability initiatives align with the ten UNGC principles.

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<thead>
<tr>
<th>Crown initiative</th>
<th>Environment</th>
<th>Health and safety</th>
<th>Data privacy</th>
<th>Fair labor practices</th>
<th>Community partnership</th>
<th>Stakeholder engagement</th>
<th>Anti-bribery and corruption</th>
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<td>6. Elimination of discrimination in respect to employment and occupation.</td>
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<td>7. Precautionary approach to environmental challenges.</td>
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<td>10. Work against corruption in all forms, including extortion and bribery.</td>
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Our commitment to enhancing and developing our employees, continuing to make the world we live in a better place, and ensuring we continue to operate in an ethically responsible manner that aligns with our corporate goals, remains our focus.

Our teams continue to put giving back at the center of what they do. In 2016, we saw a 4% increase in the number of branches taking part in CSR activities.

The CSR activities our teams take part in are tracked on our CSR Activity Database and are shared on internal communication channels. In doing so, we share ideas across our global business, inspiring and motivating each other to get involved. In 2016, we exceeded our target of increasing participation in CSR activities by 15%.

We stood by our responsibility to being there for our staff and each other by introducing a new set of training courses covering health and safety, personal development plus health and wellbeing. We also signed up for the Global Corporate Challenge – a global initiative that encouraged our employees to make small changes in their lives in order to improve both their physical and mental health. In 2016, 33% of Crown employees took part in the challenge with some very positive results.

Our determination to limit our impact on the environment meant we were able to exceed our targets. In comparison to the previous year’s figures, we saw a 5.2% improvement in fuel efficiency and a 10% improvement in electricity consumption. In addition, we introduced new initiatives to further reduce our carbon footprint.

Crown recognizes and values people’s differences and one of our key areas of focus in 2016 was on diversity and inclusion. Crown is, by its very nature, a culturally diverse organization, but we wanted to go one step further and ensure that all employees, irrespective of sex, race, religion and sexual orientation, felt and were represented. As a result, we introduced a Diversity and Inclusion Policy and a stand-alone training course. Plus we formed a women’s network – the Crown Coronets.

As we move into a new period in our company’s history, we will continue to evolve and strengthen our approach guided by our values and aligning our activities with the UN Global Compact to which we are signatories.

And as we look forward to the year ahead, we will continue to contribute to society while maintaining the long term success of our business and ensuring that CSR remains at the heart of everything we do.
Crown branches are committed to making our organization a sustainable one.

In 2016, staff from across the world took part in over 300 CSR activities, an increase of 15% from the previous year.

Crown employees continue to put CSR at the top of their agenda. In 2016, 87% of CSR activities they took part in supported our communities, the biggest motivator by far. These activities included working with local nongovernmental organizations to help street children in Calcutta, donating items to the Salvation Army in New Zealand, fundraising for young refugees on the run in Switzerland and hosting a Christmas party for disadvantaged children in London.
A year on from celebrating our 50th birthday, we can reflect on what an amazing year 2015 was as our employees across the world embraced CSR, taking part in Crown’s “Golden Relay”, where over US$100,000 was raised for local charities.

To demonstrate our continued commitment to our communities and to say a huge thank you to our employees who dedicated so much of their time and energy during the Golden Relay, the Crown Foundation will be donating US$ 50,000 - a “Birthday Gift”.

And we’ll be asking them to have their say in deciding how this Birthday Gift should be spent by nominating local charities supporting underserved children, and that aligns with one of Crown’s five core values. Five charities will be selected and the US$ 50,000 will be distributed to those charities equally. As we move into 2017, we’ll keep in close contact with those charities to follow their journey.

Crown’s CSR stories of 2016

Mexico donates blood and medical equipment

UAE distributes ifftar meals for Ramadan

LA raise money for pancreatic cancer

Malaysia enjoy a day of fun with orphaned children

France cleans up the Seine

Hungary donates clothing and food

Johannesburg’s food fundraiser supports the local community

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In 2016, we continued to meet and exceed our previous year’s targets, showing our determination to put CSR at the front of our business choices.

**Environment**

**Target 1:**
Redesign the reporting of our natural resource system for better accuracy and ease of use.

**Our achievement**
Following reviews and feedback from system users, we now have a defined set of enhancements which have improved usability, efficiency and speed of data availability. Our latest figures are the most accurate that they have ever been.

**Target 2:**
Improve fuel and electric efficiency by 2%.

**Our achievement**
Fuel efficiency improved by 5.2% and electricity improved by 10%.

**Target 3:**
Increase the number of CSR activities to 300 events.

**Our achievement**
The number of events our teams took part in reached 336, meaning an increase of 15%.

**Compliance**

**Target 1:**
Achieve a 10% increase in external certifications at further Crown locations.

**Our achievement**
While additional Crown businesses gained ISO14001 and ISO27001 certifications in 2016, due to market conditions, some Crown facilities faced closure and, thus, we didn’t reach a 10% increase.

**Target 2:**
Increase understanding and use of legal registers and improve local practices in environment management.

**Our achievement**
Greater awareness of the importance of the legal registers means regulatory adherence and compliance is now assured at all sites holding ISO certification. Group site standards ensure compliance at sites without ISO certification.

**Stakeholder engagement (supply chain)**

**Target 1:**
Ensure that 100% of service partners have completed the CSR-related elements of Crown’s qualification process.

**Our achievement**
We evaluate responses to all questions on our service partner questionnaire, including those related to CSR and only approve partners that have passed the criteria we have set. The questions our service partners are required to answer cover: health and safety, criminal record checks, past involvement in litigation, relationships with government officers, participation in Crown organized community or environmental related events, policy and education on anti-bribery and corruption and environmental impact policies.

**Target 2:**
Enhance due diligence to ensure responsible conduct for the high-risk parts of the supply chain.

**Our achievement**
During 2016, we completed risk assessments on all service partners in the top 40 high-risk territories as identified in the Transparency International “Corruption Index”.

How well we did
Throughout 2017, we will continue to be committed to monitoring and reporting on all activities of our business in line with the requirements of the UN Global Compact.

### Environment
We will continue to monitor vehicle fuel efficiency and electricity consumption. Additionally, we will begin to monitor and report on water and office paper consumption.

<table>
<thead>
<tr>
<th>Natural resource</th>
<th>Measurement</th>
<th>Target</th>
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<tbody>
<tr>
<td>Vehicle fuel</td>
<td>Km per liter average across all vehicles, excluding motorcycles</td>
<td>9 km per liter = continued improvement and emissions reductions</td>
</tr>
<tr>
<td>Electricity</td>
<td>Per m2 in kwh average</td>
<td>2.7 kwh per m2 = sustained and controlled</td>
</tr>
<tr>
<td>Water</td>
<td>Average per employee per liter used</td>
<td>1,800 liters = continued improvement and control</td>
</tr>
<tr>
<td>Office paper</td>
<td>Per office employee average</td>
<td>1.20 reams = improvement encouraging technology developments</td>
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</tbody>
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### Compliance
We will continue to encourage and facilitate our businesses across the world to maintain and gain external certifications.

**Our target:** Increase countries present on each certificate (ISO 1400, OHAS 18001 and ISO 27001) by one country per standard.

### Stakeholder engagement
We will continue to find ways of engaging our employees to look after themselves and the world they live in. We will also look to find ways to engage with our supply chain and encourage them to do business better.

**Our employee target**
- Increase the number of employees or countries taking part in CSR activities and reach for at least 350 recorded activities.
- To have at least 1,000 employees across the world taking part in the Global Corporate Challenge.

**Our supply chain target**
Introduce new e-Learning for our service partners in the following topics:
- Health and safety
- Environment
- Induction to working with Crown
The Crown Worldwide Group is committed to providing its employees and the wider community with a level of environmental awareness, management and control that supports community needs, expectations and wellbeing.

Environment
Crown continues to look at innovative ways of working that allow us to be more efficient, as well as control our impact on the environment.

Improving facilities

We continue to look at different ways of powering our facilities, focusing on environmentally low-impact alternatives. With every new purchase, Crown learns more about how to make these investments financially sustainable so that we can continue to expand their use around the world.

In 2010, Crown London made a forward thinking decision to install a 25 kW PV (solar panel) system. In a little under six years, this system has generated sufficient funds to cover the cost of the initial investment and we look forward to the benefits lasting upwards of 20 years.

Our “Big CO2” project for 2017 is the installation of LED lighting in some of our facilities around the world. This will see a reduction of energy consumption of between 50–75% and, with a bulb life of up to 10 years, this means our bulb waste will be significantly reduced. In addition, unlike fluorescent bulbs containing hazardous materials, LED bulbs are less damaging to the environment when disposed.

Our natural resource consumption and vehicle fuel efficiency databases enable us to monitor our consumption rates, plus keep track of all environmental initiatives that each of our offices and facilities are involved in around the world. In 2017 we are drawing plans to enhance these databases to more easily monitor our natural resource use and impact.

Going digital

In 2016, Crown Relocations launched its virtual consultation service. This new service removes the need for our consultants to physically be in a customer’s home to conduct a survey, saving time and money. We are also reducing our emissions and fuel consumption. Currently, virtual consultations are being delivered in some test markets and we hope to extend this list of countries as we move into 2017.

Santiago “drives” top quality standards

In correspondence with Crown’s initiative to reduce costs and increase competitiveness, Crown Santiago recently unveiled a brand new moving van. The previously unused Mercedes Benz Vito has a cargo capacity of up to six cubic meters of volume and is optimized to give outstanding fuel economy and reduced emissions. This supports Crown’s initiative to reduce our carbon footprint and optimizes our resources for the operation of materials handling and packaging for international moves.

Gaining ISO certifications

ISO 14001 is an externally audited international standard that specifies requirements for an effective environmental management system. Crown is continuing to gain ISO certifications across its operations and in 2016, four new branches gained their ISO 14001 certification.

Tokyo attain ISO 14001

In 2016, our Tokyo office spent many months planning and preparing to gain their ISO 14001 certification and, with the hard work of three Tokyo Environmental Committee members, they were successful.

As well as achieving their certification, Crown Tokyo has been actively participating in a number of CSR activities, including a beach clean-up where volunteers spent a half day cleaning one of the nearby beaches for Mother Earth Day. The branch will continue to support this initiative in 2017.

Placing Trees

From 2010 to 2016, Crown UK planted nearly 15,000 new trees working with PATT, a tree planting charity in Thailand. While PATT is no longer in operation, Crown’s goal for 2017 is to create a new charity partnership that will allow us to continue offsetting our carbon emissions.

In 2016, Crown UK achieved Bronze membership of the Fleet Operator Recognition Scheme (FORS), FORS is a voluntary accreditation scheme promoting best practice across the European fleet industry. In gaining this certification in the UK and seeing its benefits, we are hoping to replicate this in other locations.
Health and Safety is relevant to every part of Crown’s businesses and in 2016 we developed additional ways to create a safe place for our employees to work.

Sharing knowledge
Crown has implemented a globally accepted Health and Safety Manual, available to all employees and accessed via the Crown SharePoint site. The manual is the basis for our global OHSAS 18001 policy. Following external audits from SGS (the world’s leading inspection, verification, testing and certification company), Crown has now retained and grown to 32 certified sites, up from 20 in 2014.

To further embed good practices, we have improved access and knowledge of global processes, policy and standards in health and safety through the company’s internal SharePoint platform. This now gives our people better access to manuals, documents and local records to ensure the well-being of our employees. Certified sites can use this to manage required documentation; locations aiming for initial certification have access to guidelines enabling them to achieve certification. In addition, we continue to maintain easy-to-read pocket guides on general health and safety advice and on safe driving for all our employees.

Accident reporting
During 2016, we implemented a globally-shared Accident Reporting tool via SharePoint. All Crown facilities must report complete details relating to an accident, including cause and prevention. We now have the power to read real-time information regarding accident type, frequency and benchmarking data. This allows us to determine whether our health and safety systems are supporting our objective of constantly improving Crown’s record as a safe environment for our employees and customers.

OHSAS certifications
One of our goals for 2017 is to expand our OHSAS 18001 health and safety certification to additional locations. In doing so, we will further spread and embed safe work habits for our employees around the globe.
Being a responsible company means protecting customers’ and employees’ right to privacy. We do this by abiding to consistent policies and practices to safeguard their personal information.

Crown’s Binding Corporate Rules (BCR) on data privacy – which comply with international legislative requirements and recommendations – are mandatory privacy procedures for all our sites.

Crown’s standardized data processing rules help keep personal information safe and ensure prompt reporting to management if there is any data breach. We are certified with the EU-US Privacy Shield Program which means handling of customer data according to EU requirements.

In some cases, sensitive information is also handled by Crown’s service partners. Therefore our supply chain management system emphasizes compliance with data privacy policies through the qualifying and contractual stages of an engagement. This process is led by Crown’s Chief Risk Officer and a Group Compliance Officer, both appointed in 2014.

ISO 27001 is an externally audited information security standard that Crown has achieved and is extending to its businesses around the globe. At the end of 2016, we’d increased the number of Crown sites with this certification to 29, including our Hong Kong headquarters – this is an increase from 2015. Now our headquarters have reached this goal, it will positively impact other Crown branches across the organization. During 2016, four new sites gained certification and we hope to further increase this number in the coming year.

Australia attain ISO 27001
Crown Australia has added a further string to their bow with the successful certification of ISO 27001 – Information Security.

Over the past eight months their project team of Carl Pearson (National IT Manager), Melissa O’Connor (National HR Manager) and Peter Schacht (National Alliance and Quality Manager) have been working behind the scenes in preparation for this ISO 27001 certification.

The project team underwent four days of intense auditing where SGS reviewed all Crown Australia’s processes in detail. We were able to demonstrate our true commitment to Information Security.

This certification, together with certificates the branch already holds: ISO 9001, 14001 and OHSAS 18001, allows us to fully demonstrate to all of our customers our total commitment to best in class processes and commitment to quality.
We are committed to treating our employees fairly. In addition to complying with local employment laws, we support the labor principles of the UN Global Compact, which include:

- Equal opportunity employment
- Prohibiting child labor
- Prohibiting mistreatment by workplace bullying
- Prohibiting sexual harassment
- Prohibiting retaliation to employee seeking to invoke his/her rights

These policies are detailed in our formal Code of Conduct that documents a zero-tolerance for discriminatory practices, forced labor or the employment of children under 16 years of age — all of which Crown views as violations of basic human rights. Our Code of Conduct is acknowledged annually by all employees; any suggested violation of these principles will result in investigation and corrective action.

Crown’s Group Vice President of Human Resources and our global HR team maintain and manage these labor policies.

Where it all began

In 1965 a young American man traveled to Yokohama in Japan. With little spoken Japanese but a dream five times bolder than his plan, he established Crown. The business has today expanded to 266 locations in almost 60 countries, with employees of 74 nationalities speaking 58 languages. However diversity is more than just a collection of people from different countries.

Human rights and labor

Crown has recognized and embraced this diversity in all its forms and in 2016 Crown created a specific Diversity and Inclusion Policy.

Crown is committed to ensuring that women’s skills and insights are represented throughout our company and 2016 saw the formation of the Crown Coronets — a women only network created to support and inspire the growth of women working for the Crown Worldwide Group. Our goal is that Crown women, benefiting from a network of peer support, role modeling and a mentoring environment, will develop the confidence to drive their personal career development and ultimately, Crown’s success.
Thinking forward

Diversity is one part of the equation, but inclusion is the real commitment. In 2017, we will be implementing unconscious bias training at all levels of the organization. Plus, we’re looking at growing networks for other diversity groups.

Diversity is measured in many ways: ideas, geographies, economic and cultural backgrounds, religion, disabilities, race, gender, work experiences, generational differences, sexual orientation, education and more. So, in 2017 we will also be enhancing our HR system to allow us to confidentially collect diversity data, which will ensure we can continue to keep diversity at the forefront of what we do.

Diversity is at the heart of Crown and will help us to innovate as we grow through the next 50 years. Inclusion is about leveraging this diversity to achieve results. It is about creating an environment where everyone is valued, where everyone is safe to bring their differences to work each day and where they can always contribute.

“When Crown values employee diversity, we have a better balance of views, more effective decision making, it leads to innovation, and to put it simply, diversity makes Crown a better place to work.”
– Barry Koolen, Executive Board
Engaging our stakeholders is key to successful relationships with our employees, our clients and our services partners. In 2016 we implemented strategies enabling us to foster all of these relationships.

1. Developing our employees

Crown’s CSR goals help each employee reflect on the impact of their role and find measurable ways to improve their commitment to CSR. To help them do this, Crown’s global Employee Volunteering Policy encourages employees to get involved in making a positive impact to their local communities. Every single employee is provided with two paid volunteering days per year.

This initiative:
• Enables volunteers to give back to the communities in ways that are personally and locally meaningful
• Builds teamwork and strengthens relationships between colleagues
• Develops self-confidence by meeting new challenges outside of the workplace
• Helps develop management and other skills that are professionally and personally beneficial

Studies show that employees of companies involved in CSR activities are more engaged in their workplace and therefore more productive. CSR activities grew by 15% in 2016, which evidences the growing engagement of our employees.

2. Caring for our employees

The health and well-being of our employees is of great importance to Crown. In 2016 we took part in the Global Corporate Challenge (GCC), a 100 day challenge involving thousands of employees from global companies competing to improve their mental and physical health, with some amazing results:
• One third of our workforce across the globe registered to take part in the program
• The same percentage of employees completed the pre-GCC survey and post-GCC survey

In comparing the results of pre versus post GCC journey, we found the following:
• 71% of staff reported a decrease in their stress levels – either home or work
• 57% reported an increase in productivity
• 89% said they were more aware of their exercise
• 91% said they would participate again

Equally important through tracking the overall data in GCC’s system, we found that 64% of employees increased their exercise levels to 10,000 steps or more per day.

We had some real success in 2016 and we want to apply that knowledge to make our participation in the 2017 campaign even better.
3. Engaging our employees

The Crown Employee Survey measures employee engagement across our global workforce. 2016 was the second consecutive year the survey was undertaken, with a 15% increase in response rate.

The results

- The Employee Engagement score increased to 81%, based on four criteria including “Crown is a great place to work” and “Crown is making a difference”.
- The Inspired Employees score increased to 70% based on four criteria including “Crown is serious about making the world a better place” and “Crown senior leadership team believes in and shares the company’s values”.
- The three areas of celebration remained the same as 2015—employees feeling they are contributing to Crown success, building Crown values into everything they do and enjoying a good and safe working environment.
- Drivers with a decline from 2015 to 2016 included teamwork and inspirational leadership.
- Our areas of focus for 2017 remain the same—benefits, career discussion and praising employees.
- The engagement and active engagement scores indicate that employees are not only engaged with their job and team, but also inspired by the company’s mission and leaders.

Generally, employees are proud of Crown’s values, company culture, work environments, diversity and CSR.

4. Investing in our employees

In 2016, we launched Crown’s Accredited Skills training courses, which aim to provide our employees with opportunities to continuously improve and develop their skills.

- In total 3052 accredited skills courses were taken across all regions
- The top three courses were (1) Managing Stress (2) Team Working Excellence (3) Communicating Effectively

Employees can also learn from the 64 different courses on Crown University, where in 2016 a total of 9387 courses were taken.

In 2017 we will be:

- Releasing two new programs aimed at up-skilling and developing our managers.
- Holding career-development workshops open to any employee who would like to take control of their career.
- Introducing Insights Discovery, a self-development tool which allows individuals to increase their self-awareness and self-understanding.
- Developing and reviewing our e-learning tools and implementing a new learning management system and survey tool.

“Crown is committed to bringing awareness and knowledge to all our staff. Through the next year our staff will have the opportunity and choice to belong to groups that are important and meaningful to them... a chance to self-reflect, learn, share wisdom, collaborate with others who have different skills, knowledge and perspectives, and at the same time share the same values and foundation.”

Magali Delafosse, Group VP – HR
5. Flexibility and support

Crown has also developed a robust set of policies designed to provide flexibility and support to our employees, including:

- **Volunteering**: providing every employee with two volunteering days per year.
- **Flexible working**: enabling our employees to achieve an appropriate work-life balance.
- **Career break**: offering a sympathetic response to employees wishing to take time away from work.

**Long-serving employees**: at Crown, we recognize the value of long-serving employees and believe in rewarding their commitment. In 2017, to bring consistency to our global practice, our Tenure Awards policy will be applied to all countries, across all brands and functions.

6. Recognizing our employees

**Employee Awards Program**

In 2015 Crown launched its Crown Worldwide Employee Awards Program – an initiative that recognizes and rewards our brightest and best employees who most represent our core values:

- **Outside the Box Award**
- **I’ll Be There Award**
- **Giving Back Award**
- **Great Communicator Award**
- **Strive to Succeed Award**

The awards take place every year. In its inaugural year and to celebrate Crown’s 50th anniversary, the 2015 winners were awarded inter-regional trips, and in 2016, they were able to travel to a Crown location of their choice.

In 2016, the awards program’s second year, we once again received over 400 nominations and chose a number of regional winners, as well as five overall winners in each of the award categories that match our core values.

Code of Conduct: Every employee at Crown reads and commits to Crown’s Code of Conduct. The Code of Conduct governs the way we act in Crown: how we do business, our stance on discrimination and equal opportunities, our commitment to fairness and ethical behavior, our zero tolerance of bribery and how we communicate externally and internally.

7. Partnering with clients

A focus of 2016 was to increase Crown’s partnerships with key clients and external stakeholders in CSR activities. Partnering with clients helps the community and has added benefits of helping teams to communicate and function even more successfully in business activities. This will continue to be a main focus in 2017.

**CSR partnerships with clients**

In September 2016, Crown employees worked as a team with one of our global clients by volunteering at the Society for the Prevention of Cruelty to Animals (SPCA) Singapore. Their role was to help clean the animal shelter, walk rescue dogs and tend to some of the other animals. It was a fulfilling day for all volunteers and demonstrates true partnership between Crown and their valued clients.

8. Working with our supply chain

All Crown service partners must meet certain criteria when going through Crown’s qualification process, covering Health and Safety, Anti-Bribery, data privacy and Corruption and Environmental Impacts and only those meeting the criteria are approved. This ensures that Crown is working with service partners who are aligned to Crown’s sustainability goals.

Over the past year we have:

- Embarked on a project to review the way we manage and monitor our external suppliers and how we govern ourselves.
- Increased our service partners’ agreement to our code of conduct to 85%.
- Engaged a third-party specialist to manage our compliance hotline.
- Analyzed our supply chain ownership in all territories to support local government diversity efforts.
- Improved contractual documentation to further support Crown’s commitments to its clients relating to employment practices.
- Encouraged our supply chain to participate in Crown organized events that support our community related activities.

In 2016 we also completed risk assessments on all partners in the top 40 high-risk territories as identified in the Transparency International “Corruption Index” and will extend this further in 2017 when we embark upon creating a Risk Profile for our service partners.

We will continue to expand our knowledge portfolio to further educate and engage our supply chain where appropriate.

Crown has mandatory e-Learning programs on Data Privacy and Doing Business without Bribery, which all of our service partners, whether new or recertifying, must undertake.
It is Crown’s policy to conduct business with a zero-tolerance approach to bribery and corruption. Crown is committed to acting professionally, fairly and with integrity in compliance with global anti-corruption laws. We continue to improve, implement and enforce systems to counter bribery and corruption in our business dealings and relationships.

As with any global business, this comes with challenges when doing business in almost every country of the world. In 2015, Crown focused on further assuring full compliance in every country, including those with less developed legislation on anti-bribery and corruption (ABC). This requirement covers every service segment, even those most at risk. To facilitate 100% compliance, all service providers are being vetted, trained and sign our Service Partner Agreement (which includes a provision that we can audit their accounts/processes at any time). This will enable us to more easily conduct periodic audits, especially in high-risk locations.

These enhancements are targeted to be fully implemented by the end of 2016. Service partners undergo training on anti-bribery and corruption through our “Doing Business without Bribery” program. In 2015, 23% of service partners completed the course and in 2016, we had completion by 85% of partners. We are specifically targeting service partners in areas with low levels of existing corporate governance.

Every year, Crown employees receive training on our Anti-Bribery and Corruption Policy; this also helps our people learn how to identify and avoid supporting improper practices of others.

Employees also receive awareness training on our documented global Code of Conduct. This details expectations of every employee when it comes to business integrity. Acknowledged by employees annually through Crown’s performance management system, these include rules on appropriate practices related to:

- Conflicts of interest
- Securities and anti-trust laws
- Agreements/collusion with competitors, customers or licensees
- Relationships with public officials
- Bribery, kickback and fraud
- Sanctions and trade embargoes

Also available to all our employees is a third-party hosted ethics and compliance hotline to anonymously report any suspicious activities. These programs are driven by Crown’s Chief Risk Officer and Group Compliance Officer, roles which work independently and impartially to uphold our objective to work against corruption in all forms.

BS 10500 is a new standard intended to help an organization to implement an effective anti-bribery management system. Crown’s UK entity is the first to be certified.