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VFS Global

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*Data as on 31 December 2019

LETTER FROM CEO



This report is an important step in our sustainability and ESG leadership journey, and I am excited to travel that path with you.

Welcome to the VFS Global Sustainability Report 2019. This report brings our long track record of responsible business practices and new initiatives together in an accessible way for our stakeholders.

DRIVERS FOR GROWTH

As the world's largest government visa outsourcing and technology services specialist, our outlook in this rapidly expanding industry segment is good. In emerging economies, travel is no longer a luxury, it is a necessity. Tighter border controls and uptake of biometrics are placing greater importance on effective and innovative visa services, and I am very proud of how VFS Global has grown to meet these opportunities.

Our purpose is to enable smooth travel for customers and efficient visa processes for governments. We are now present in 150 countries, serving 64 client governments across five continents. In 2019, we hit the milestone of 200 million visa applications since inception in 2001 - a significant achievement.

TRUST BUILT ON PERFORMANCE

VFS Global has a strong track record as a reliable and trusted industry leader. Our business is based on trust and our credibility is built on performance. To succeed, we will continue to invest in our people, our systems, and our technology, as well as creating effective frameworks that support our growth.

It's why we put such emphasis on core competencies such as achieving PCMM Level 5, which certifies the strength of our organisational culture (see, p.13). It's why we have further strengthened our Code of Conduct (see p.15). And it's why we continue to drive innovation by investing annually a double-digit million amount in Swiss francs toward the digital transformation of our industry (see p.04).

MANAGING RISK

A cornerstone of trust is responsible risk management. Our customers entrust us with important documents and secure handling of personal data, and we take this extremely seriously. We do not store customer data beyond the application process, as per requirements of our client governments. Our state-of-the-art compliance and security systems enable our managers to identify and mitigate risks in our business activities. Integrity is one of our core values and we have zero tolerance for fraud and unethical business practices.

STAYING AGILE

Together with strong controls, our industry must stay agile to respond to changing market needs.

In 2019, we introduced our 'Customer First' initiative to enhance our customer care culture and ensure excellent service outcomes, including during peak season when application volumes are high. I look forward to reporting on our progress in this important area going forward.

FUTURE FOCUS

VFS Global is committed to being a good corporate citizen through continuously improving our sustainability and ESG (Environment, Social and Governance) performance. We will set ambitious ESG targets and measure our progress against them. This report is an important step on our sustainability and ESG leadership journey, and I am excited to travel that path with you. I hope you enjoy reading about our progress and look forward to your feedback.

Zubin Karkaria
CEO - VFS Global Group

STRATEGY

Business Model

VFS Global is the world's largest provider of visa and consular services.

WHAT WE DO

We support client governments by managing the administrative and non-judgemental tasks related to visa, passport, identity management, and other citizen services including data and visa application processing.

We currently service 64* client governments in 150 countries across five continents. Our 3,315 Visa Application Centres (VACs) processed over 30 million Visa applications in 2019, with a total of 219 million applications processed since inception in 2001, and around 95 million biometric enrolments since 2007. For individual customers, we provide a secure, efficient one-stop shop for visas, consular and citizen services. For governments, we manage the administrative tasks that enable them to focus entirely on the assessment of applications.

Our corporate headquarters are in Zurich, Switzerland, while the management headquarters are in Dubai, UAE. We are a portfolio company of EQT, a leading global private equity firm based in Stockholm, Sweden. The Swiss-based Kuoni and Hugenobler Foundation indirectly holds a stake in VFS Global.

HOW WE CREATE VALUE

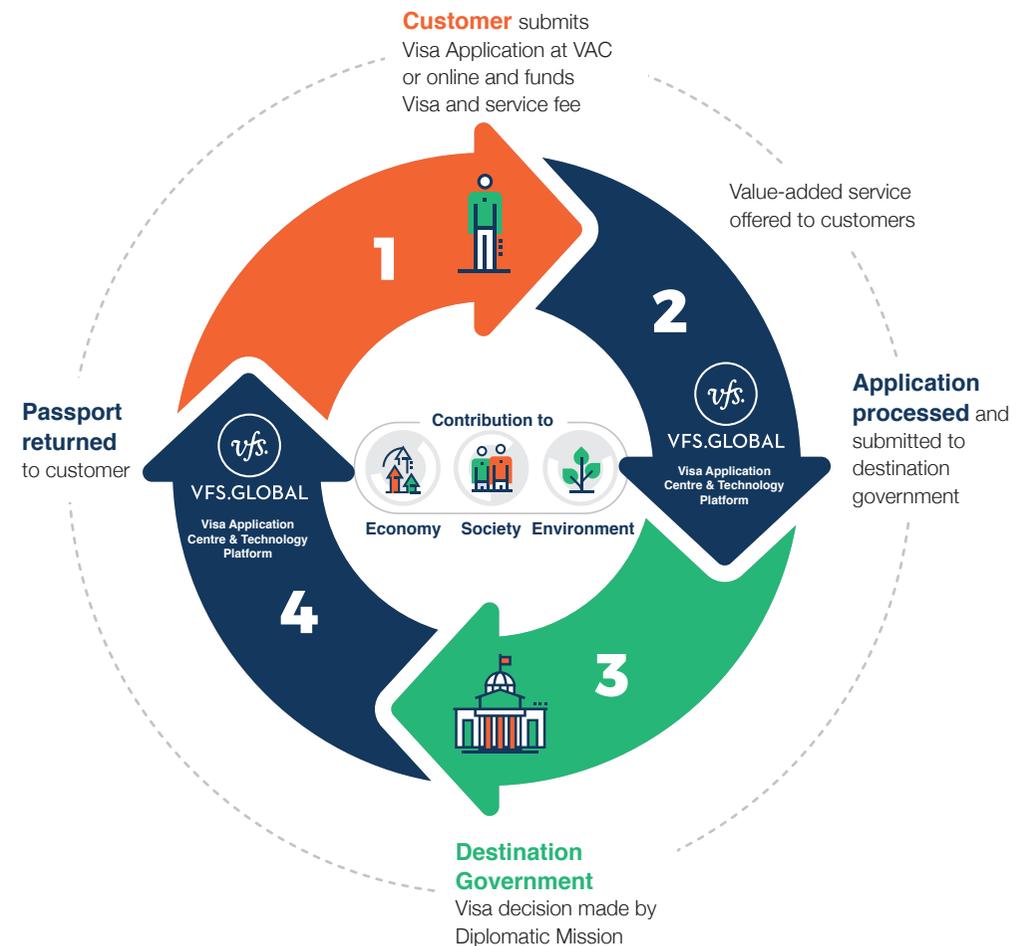
At VFS Global, our aim is to enhance customer experience by making the visa application process and other consular related services as safe, automated, and seamless as possible. Through our global presence and dedicated employees, we create value for all our stakeholders, including the society at large. We are a people business and have built a strong customer-focused culture. Our team is made up of competent and dedicated staff supported by innovative technology platforms to ensure security, satisfaction, and efficiency.

Through our customised services, we help our client governments reduce process complexity while they minimise costs, achieve results and enhance customer experiences. In everything we do, data privacy and security are paramount. For this reason, VFS Global does not store any customer data beyond the visa application process. In line with our core values of Integrity, Commitment, and Entrepreneurship, we employ strict protocols around the entire application processes as well as around the enrolment and encryption of biometric information.

In addition to front-end operations and our VACs, we also offer a range of additional services such as convenient, expedited application submission through Premium Lounges at our centres and the value-added 'Visa at Your Doorstep' service, which brings convenience and greater accessibility to those

who cannot personally visit a centre. In a largely compliance-driven sector, a key point of differentiation for us is also to lead our industry beyond compliance.

OUR BUSINESS MODEL



STRATEGY

Governance

At VFS Global, we are committed to exceptional service delivery and practices. That means our infrastructure, solutions, and management of sustainability and Environmental, Social and Governance (ESG) factors must meet the highest standards.

RISK MANAGEMENT AND ACCOUNTABILITY

Our industry is strongly focused on compliance and our dedicated Head of Compliance reports directly to the Chief Executive Officer and the Audit Committee.

In line with our internal audit charter and manual, our internal audit takes a threefold approach of compliance, controls, and advisory practices. Issues are rated by level of risk and adequacy of controls. Audit findings are compiled before a 'management response' is developed, and agreed actions are implemented. In 2019, we carried out several thousand internal audits with zero high-risk findings. Each quarter, Country Managers and Department Heads must sign off on compliance checklists. In 2019, compliance checklists were rolled out to an additional 18 countries, bringing the total to 67.

Our operations and processes also undergo regular audits conducted by our client governments, carried out both by central Ministries and also by local consular teams from diplomatic missions. For example, the new EU visa code requires Schengen

governments to conduct audits of visa application centres every nine months. In some cases, we also undertake joint audits with our client governments - an area that will see an increased focus in 2020.

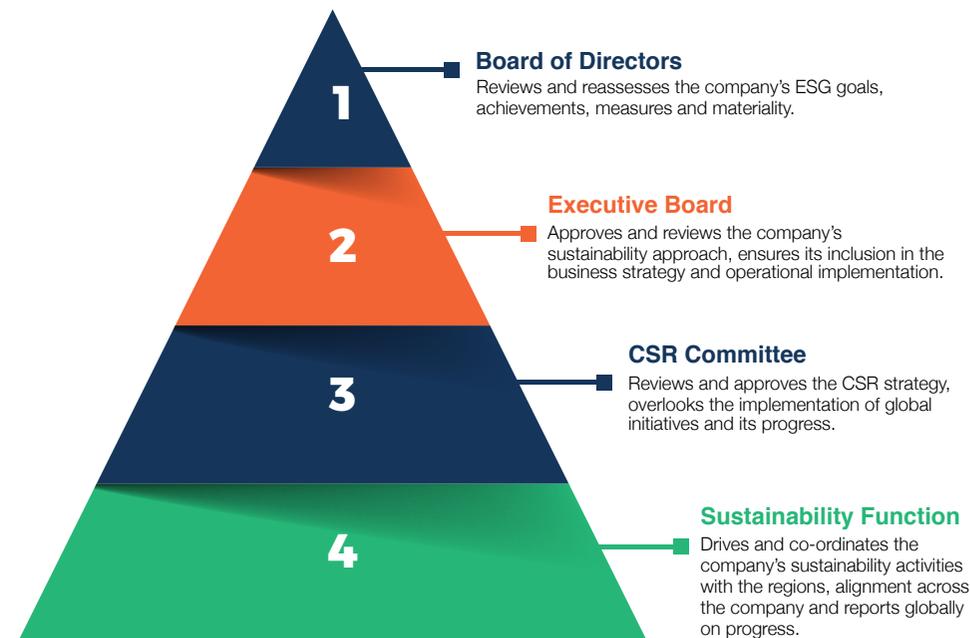
An Enterprise Risk Management System is currently under development, and we have established a CSR (Corporate Social Responsibility) Committee comprised of our Chief Financial Officer, Chief HR Officer and Chief Communications Officer. We have developed a CSR Policy to ensure compliance with CSR as per The Companies Act, 2013 (India)

OUR SUSTAINABILITY ROADMAP

VFS Global adheres to the 10 core principles of the UN Global Compact in the areas of human rights, labour, environment, and anti-bribery and corruption. Our standards and expectations are set out in the VFS Global Code of Conduct, Human Resources, and Diversity and Inclusion policies.

Our key strategic objectives for sustainability include:

- Establishing a robust sustainability process
- Tracking and reporting of key performance indicators (KPIs)—including for diversity, ethics, anti-bribery and corruption, and greenhouse gas (GHG) emissions
- Creating awareness initiatives for employees
- Further developing and improving our sustainability strategy



MONITORING AND REPORTING

Our Chief Communications Officer is responsible for leading and monitoring sustainability performance and reputational indicators, covering legal and regulatory matters, and finance and taxation, overseeing technical and information security monitoring, and for keeping abreast of political and societal issues, including employee engagement and environmental concerns.

The KPI targets, initiatives and achievements as well as the materiality assessment are annually reviewed by the company's Board of Directors.

Our 2019 materiality assessment identified 13 main areas of impact. See Materiality (page 06).

STRATEGY

Materiality

MATERIALITY APPROACH

In 2019, VFS Global reviewed and updated its existing materiality assessment. From a universe of relevant sustainability topics including global trends, sector requirements, and stakeholder priorities, a list of 13 topics was ranked by a working group according to their significance to the society and to the business, and mapped on a materiality matrix, as shown on the right.

Five priority themes emerged from the assessment:

- Resilience
- Beyond Compliance
- People
- Environment
- Economic Contribution

Each of these forming a chapter heading in this report, and within each chapter, we report on key topics such as data protection, information security, employee engagement, anti-bribery and corruption protections, and customer service.

As a service company with over 3,000 centres, we are continuously trying to reduce our environmental footprint. For example we have defined specific KPIs to report against, and monitor our annual carbon emissions and water usage. To drive further improvements, we have initiated projects to source green or renewable energy, for our VACs and offices and to have plastic bottle-free VACs in our network.

ENGAGING OUR STAKEHOLDERS

At VFS Global, our primary stakeholders are our client governments, our visa customers, and our employees. We engage these important stakeholders in a range of ways.

CLIENT GOVERNMENTS

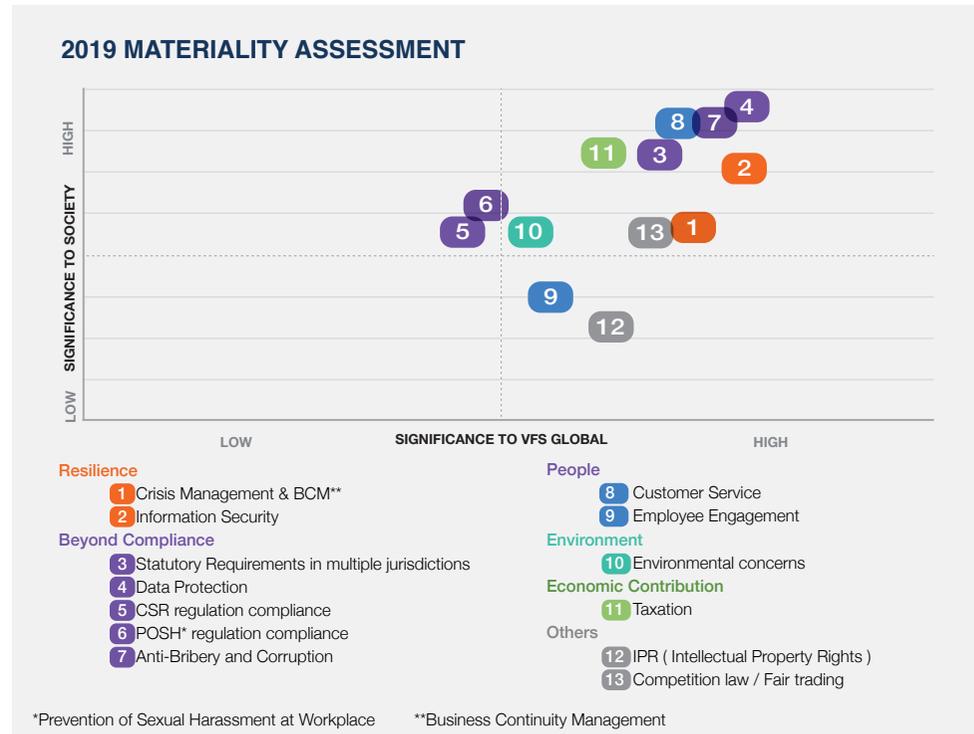
Adhering to local laws and regulations in all the countries of operation where we represent our client governments is of critical importance.

We believe the most important areas for our clients are:

1. Adhering to all service level agreements with 100% compliance
2. Continuing to be a trusted outsourcing partner that operates at the highest levels of service quality
3. Developing innovative ideas to further streamline the overall process

CUSTOMERS

Clear expectations are built into our Service Level Agreements (SLAs) with client governments. To help track our performance, we have implemented a 'Voice of Customer' initiative, which provides insights via email, social media, and digital and physical feedback forms. In addition, our 'Customer First' initiative helps our departments to manage customer expectations more efficiently. And our omni-channel platform provides real-time tracking and monitoring of



customer feedback across multiple platforms. Additionally, we have introduced a dedicated 'Twitter handle' - @VFSGlobalCare, to respond faster to customers on social media. The key areas that matter to our customers are:

1. Smooth and convenient application process experience
2. Ability to find out the status of their application
3. Assurance their data and documents are safe

EMPLOYEES

We have over 11,000 employees from 139 nationalities across our operations.

The most important areas for our employees are:

1. Empowerment and collaboration
2. Training and career growth opportunities
3. Rewards & Recognition.

COMMUNITY

We engage with the wider community through our philanthropic and apprenticeship activities, in addition to our employee volunteering programme and participation in community services (see People section p.22).

STRATEGY

Sustainable Development Goals

VFS Global is committed to being a good corporate citizen.

The United Nations Sustainable Development Goals (SDGs) set out a shared roadmap for the world we want, and a to-do list for the planet. To ensure we are aligned with global sustainability priorities, we have

mapped our business activities with the SDG's where we see most overlap and relevance to us, and our stakeholders. This enables us to take initiatives that contribute towards the SDG goals.

The table below indicates those goals and targets identified as areas where VFS Global

can make the biggest difference. Our contribution to each goal is described in the relevant section of the report, with examples of what we are doing. Going forward, we will set ambitious performance targets in line with the SDGs.

SDG	TARGET	CHAPTER	EXAMPLES OF WHAT WE ARE DOING TO SUPPORT THE GOALS
	<p>17.16 Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilise and share knowledge, expertise, technology and financial resources.</p> <p>17.17 Encourage and promote effective public, public - private and civil society partnerships, building on the experience and resourcing strategies of partnerships.</p>	Resilience	<p>We use our knowledge and experience to support the World Travel and Tourism Council's visa facilitation initiatives. See page 04.</p> <p>Our visa facilitation partnership with client governments frees them to assess and make decisions about visas more effectively, and at a lower cost for tax payers. See page 04.</p>
	<p>16.05 Substantially reduce corruption and bribery in all their forms</p> <p>16.06 Develop effective, accountable and transparent institutions at all levels</p>	Beyond compliance	<p>Our refreshed Code of Conduct includes a widely promoted Speak Up process and we completed our Code of Conduct 'Train-the-Trainers' programme by 2019-end. See page 15.</p> <p>We clarify travel documentation processes, and support people from Zimbabwe and Lesotho to get the permits needed to work abroad. See page 25.</p>
	<p>8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking</p> <p>8.8 Protect labour rights and promote safe and secure working environments for all workers</p>	People	<p>Our Code of Conduct is explicit about identifying and reporting all incidences of forced or slave labour and human trafficking. See page 16.</p> <p>Rigorous training and security measures ensure that our people and customers are safe at all times. See page 08.</p>
	<p>7.2 By 2030, increase substantially the share of renewable energy in the global energy mix</p> <p>7.3 By 2030, double the global rate of improvement in energy efficiency</p>	Environment	<p>Through our partnership with the NGO 'myclimate', we contribute to a biogas project in Kolar near Bangalore, India that provides renewable energy to over 40,000 people. See page 24.</p> <p>Our eVisa services save energy by reducing customer travel and limiting paper use. See page 12.</p>
	<p>10.2 By 2030, empower and promote the social and economic inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status</p> <p>10.7 Facilitate orderly, safe, regular and responsible mobility of people</p>	Economic Contribution	<p>VFS Global counts 139 nationalities amongst its employees. Managers are encouraged to work all over the world – we are proud of our diversity of people and thought. See page 19.</p> <p>Enabling mobility and improving the visa application experience are at the heart of our business. We processed 200 million visa applications between 2001 and 2019. See page 04.</p>

RESILIENCE

Physical Security

As VFS Global continues to grow, we want to be the market leader in the visa and consular management solutions industry. To maintain trust, we work to ensure that our levels of information security, data protection, and data privacy are the highest possible. We also strive to ensure that our customers feel secure in all our centres.

CUSTOMER SECURITY & SAFETY

Customer safety at Visa Application Centres (VACs) always comes first. Our trained security specialists oversee this. All customers are screened, and all premises are monitored around the clock. A dedicated Global Security Operations Centre keeps special watch over VACs in some of the more vulnerable locations around the world, supported by Regional Security Operations Centres.

Documentation itself is kept as safe as possible. Items are scanned and barcoded, and always transported under padlock in tamper-proof zip-seal bags.

Outside our VACs, high security is also maintained. Vehicles transporting documents are electronically monitored in real time. They are equipped with duress alarms, and SMS alerts trigger automatically if vehicles speed, halt for too long, or deviate from their specified routes.

DATA SECURITY JOURNEY AT VFS GLOBAL

STEP 1:

Online application form is stored in a secure data centre, encrypted and under controlled access. The centre is constantly upgraded for defence against physical intrusion.

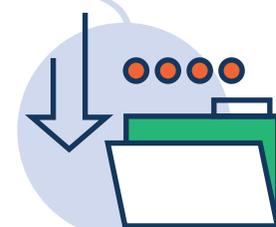


STEP 2:

Applicant visits the centre, with supporting data. Physical documentation is sealed, and any electronic data, including biometrics, is captured and encrypted.

STEP 3:

Data is safely transferred to the embassy or consulate. The exact manner is agreed on with client governments.



STEP 4:

All data is purged, typically within 24 hours of the completed application cycle, unless client governments direct otherwise. After 30 days, no record of data is available anywhere in the VFS Global system.

RESILIENCE

Information Security

We are uncompromising about the security of our customers' personal information. Our Information Security Management System, ISMS, is a three-component structure of People, Processes, and Technology, collectively certified to ISO/IEC 27001.

PEOPLE

We have a trained and dedicated data protection team lead by our Privacy & Group Data Protection Officer, who reports directly to the Chief Executive Officer and collaborates with the information security team and other key stakeholders.

Stringent background checks are carried out on all employees before they work in a VAC. All staff, including seasonal personnel, undergo mandatory and regular retraining in policies, procedures, and guidelines.

PROCESSES

Our service involves processing of significant volumes of personal data. For security, speed, and reliability, we automate this data processing. This keeps us efficient. Once customers' applications are completed, we purge their personal data. And unless a client government requests otherwise, we delete each applicant's information within 24 hours of receiving it. We make sure the system works securely with a privacy framework across the entire organisation.

We undergo regular government audits and conduct our own audits as well. We expect our centre managers to be ready to answer more than 60 questions in areas ranging from accountability and governance to record management, data retention, training and awareness, security of personal data, and data sharing.

In 2019, we conducted over 6,000 internal, external, and government audits. As a result, there were no significant issues registered.

TECHNOLOGY

To ensure security remains an integral element of all our systems and services, we have employed cutting-edge security solutions to bolster our cybersecurity defences and combat cyber threats.

Every centre is protected with perimeter firewalls. Centre personnel see only the applications for which they are responsible and have restricted access within the application. Every server and computer have their own additional firewall as well as antivirus and Advanced Threat Protection, which is continuously monitored. All traffic entering and leaving the VFS Global network is monitored at all times and swift action is taken when unusual behaviour is detected.



DATA PROTECTION & DATA PRIVACY

Cybercrime and personal data theft is an increasing risk. We want customers to know that we are committed to the safety of their data. Our robust security response is the right thing to do, and in the bigger picture, it's also good for our business.

We also want our customers to understand the steps we follow to respect their privacy. There are important data-use concerns that we address, such as consent and choice, clarity of purpose, the collection only of information that is needed, and commitment to data accuracy.

At VFS Global, our privacy controls are compliant with the ISO 29100:2011 Standard, and we were one of the few global companies ready to comply with the European Union-mandated General Data Protection Regulation (GDPR) as soon as it came into force in May 2018. The ISO and GDPR standards are the most rigorous in the world, and we apply them globally – in 150 countries – even if individual countries don't require it.

Underpinning all our operations is a robust privacy framework that is supported by information security technology. This includes multi-level safeguards, not just in physical infrastructure but also in our virtual systems. To use a tech term, we have a 'Defence in Depth' (DID) model – layered defensive mechanisms, using people, processes and technology, to protect valuable data – which are manned by highly trained and experienced staff.

VFS Global doesn't retain any applicant data. Personal data is collected at the Visa Application Centre and directly transmitted to the receiving client mission. On successful acknowledgement of receipt, that data is purged from the sending system. Paper documents are sent to the client mission by secured transportation. No copies of applicants' data are made either digitally or physically. We comply with the EU General Data Protection Regulation and with data protection laws in our countries of operation.

DATA PROTECTION GOVERNANCE

Responsibility for data protection lies with everyone within our organisation. Data protection is overseen by our Privacy and Group Data Protection Officer, who ensures compliance with the requirements laid down by data privacy and data protection laws and regulations. In addition, the Privacy and Group Data Protection Officer makes sure our privacy programme aligns with our business strategy ensuring that it is a business enabler and has a positive impact on revenue.



VFS Global is compliant with the EU General Data Protection Regulation



Global Resilience Centre - Mumbai, India



Global Resilience Centre - Dubai, UAE

RESILIENCE

Process Excellence

Client governments and customers expect easy access to our services, straightforward answers to all their questions, and above all, rapid turnaround of their applications.

We aim to deliver consistent, best-in-class experience across channels thereby enhancing customer satisfaction, loyalty, and brand sentiment.

CUSTOMER-CENTRIC SERVICE

A focus on customer experience is at the heart of everything we do at VFS Global. We approach the customer experience through a combination of accessible technology, training and value-added services.

Our approach to provide a best-in-class customer experience is illustrated below.

With a renewed focus on enhancing customer experience, our aim is to provide reliable, timely, accurate and quality Customer Care, with empathy to our customers and governments at VFS Global.



Real-Time Support Management - Mumbai, India



- 1** Promoting 'Customer First', our customer-centric care promise
- 2** Driving synergies across teams to resolve customer issues
- 3** Capturing the customers' 'Single Voice'
- 4** Continuous improvement, and ever-faster resolution of any service issues
- 5** Intuitive, customer-friendly interface design at all our centres

CUSTOMER-CENTRIC SUCCESS

In April 2019, VFS Global won the Dubai Quality Global Award (DQGA) and achieved 5 Stars in the Emirates Business Rating Scheme (EBRS). We are the first and only multi-national company to achieve EBRS rating in the 'Service' sector in the United Arab Emirates.

VFS Global was assessed as a winner through the 9-point RADAR Assessment and Management evaluation criteria: Leadership, Strategy, People, Partnership & Resources, Processes, Products & Services, People Results, Customer Results, Society Results, and Business Results.

ACCESSIBLE TECHNOLOGY

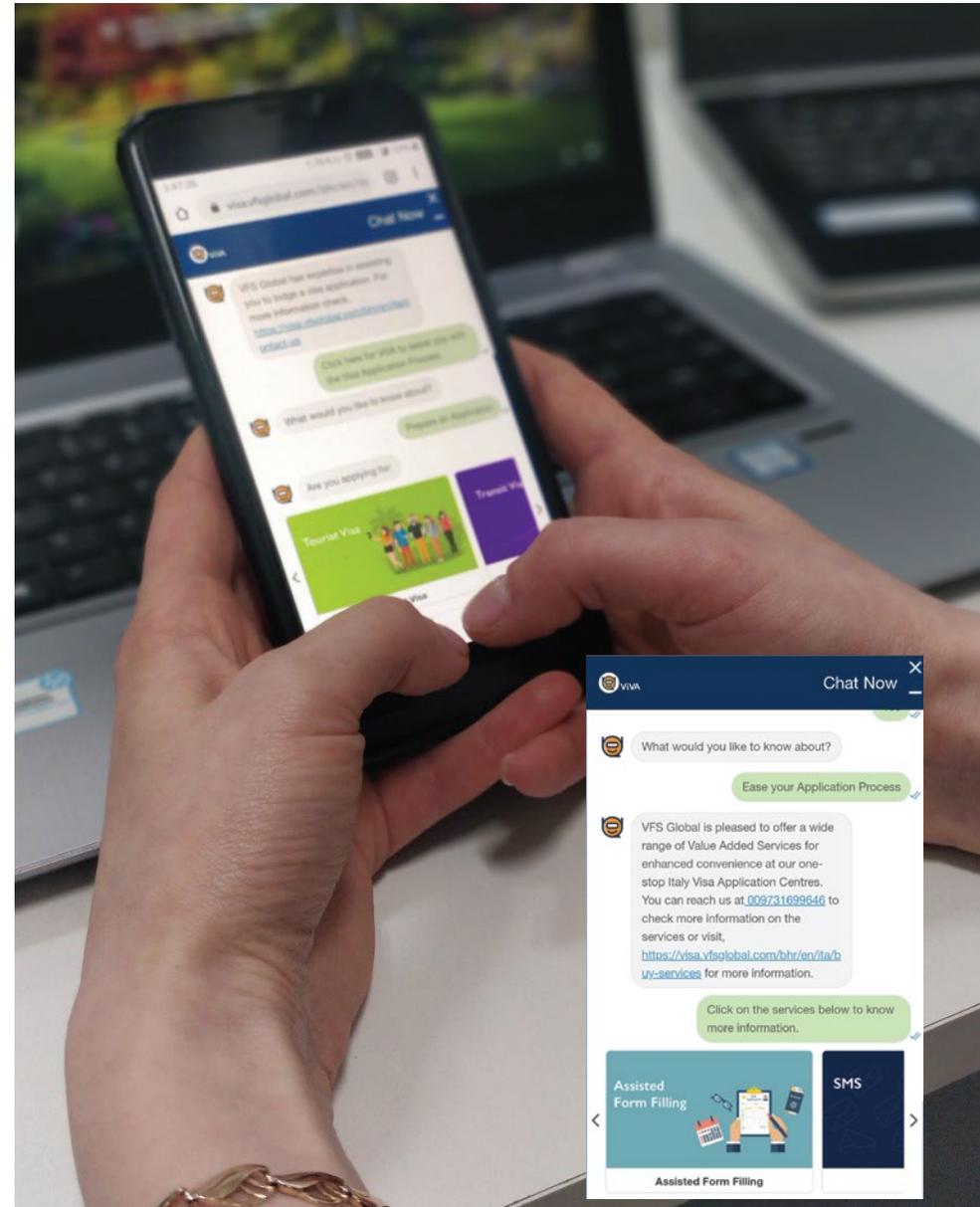
Visa applications through VFS Global have doubled in the last four years. Between 2001 and 2015, they grew to 100 million, and by 2019 totalled over 200 million. We have met this growth with innovative technology solutions and streamlining of all our processes and have maintained turnaround times as defined by the Service Level Agreements (SLAs) with our client governments.

We have simplified content, navigation, and design of our websites to accommodate more than 130 million web sessions annually. In this way, we direct our customers through a seamless and efficient visa application journey.

Our digital approach has evolved organically through the extensive customer research and feedback we have received.

Our eVisa solution has been designed to reduce customer frictions through an end-to-end online process, ensuring same experience across all the devices and platforms. We have also introduced VIVA, a chatbot, which is our first digital employee. With advanced machine-learning technology, VIVA answers up to 93% of applicants' questions, in real time, day or night.

Leveraging technology, we are improving operational efficiency, allowing VAC staff to focus on customer assistance, especially during peak holiday times. In collaboration with the Ministry of Foreign Affairs of Finland, we have developed a platform called LIDPro™ (Location Independent Document Processing). This tool enabled our client to reduce the number of visa officers in St. Petersburg from over 100, during peak season, to 20, making the process more efficient by optimising human resources. It also allows digitised documents to be sent to embassies and consulates directly for decision making, which is more convenient for our client governments. It is in use for governments of Finland as well as Austria, Cyprus, the UK, and Lesotho.



VIVA: Round-the-clock visa assistant!

PEOPLE PROCESSES

To stay agile in a changing business world, we use a management framework developed at Carnegie Mellon University, called the People Capability Maturity Model (PCMM). This is a robust business excellence system (see case study on the right), and within it we recently achieved Level-5 accreditation - the highest on the scale.

PCMM has helped VFS Global in aligning various HR processes towards building people capabilities for achieving business objectives through Competency-Based HR Management Framework. The focal point of the framework is Strategic Workforce Planning.

Workforce Plans are commissioned to continuously improve the organization's readiness through various people practices and activities such as learning and development, internal and external sourcing, engagement, and retention programmes for key talent; or even through other partnerships, alliances and/or independent contracting. Thus, all HR processes, such as Staffing, Performance Management, Learning & Development, Talent Management are aligned towards bridging the people capability/ competency gaps to meet the business objectives.

VALUE-ADDED SERVICES

We know that people are busy, and at VFS Global, we pride ourselves on our entrepreneurial approach to making visa

applications easy and efficient. Optional value-added services can be booked online from home or later at a VAC and at a customer's own discretion, to enhance convenience during the application process. In 2019, we witnessed an increased demand for these optional value-added services.



Visa At Your Doorstep is an end-to-end visa service conducted entirely at the customer's home or office. It is convenient and efficient, and is especially beneficial for people living further away from our centres.



Another optional service is our Premium Lounge. This is a personal service that offers local language professionals to assist with preparation, expedited submission, and courier return of passports and documents.

Some customers require privacy, others require speed, and some want a combination of the two. Therefore, in addition to optional services like Visa At Your Doorstep and Premium Lounge, we also facilitate Priority and Super Priority visa application services as offered by UKVI (United Kingdom Visa & Immigration), for people applying to the UK. Under these services, UKVI endeavours to achieve turnaround times of 5 days or 24 hours respectively.

For working people who find it difficult to visit a centre during business hours, we offer Prime Time appointment slots too, to keep their visits as short as possible. And for those who simply cannot come to a centre until after work, we also do offer after-hours walk-in appointments, at an additional charge.

We make it clear to customers that our optional value-added services have no impact on visa decisions by client governments.

MEETING CHALLENGES

Applications peak in holiday season generally between April and August, as part of the annual travel cycles, and varies in the different regions across the world. Rise in application volumes also lead to lengthened waiting times at the VACs. In 2020, we aim to address these challenges through pre-peak readiness measures such as capacity planning and dedicated Customer Experience Managers at VACs.

CASE STORY



PCMM is a structured framework to align HR practices and action plans with our business objectives, thereby making us more agile in responding to changing business needs, including how we serve our customers at our centres.

One critical performance measure for VFS Global is our 'Voice of Customer' (VOC). Analysis conducted to identify key measures impacting VOC feedback showed that customer's time spent waiting at VACs is important.

To address this, we implemented a Certification/ Recertification programme for our submission officers across our VACs in South Asia, to improve their operational capabilities thereby reducing customers' time at a VAC. We also introduced a quick feedback survey, part of our Customer Interaction Programme (CIP), to measure the success of the process.

The impact of improvement was statistically validated through the CIP scores in the VOC feedback after successful implementation of Certification/ Recertification programme.

RESILIENCE

Business Continuity

At VFS Global, we know that client governments rely on us for uninterrupted service. To respond to potential disruptors of any kind, we have implemented tiered incident response plans designed to function at the operational, tactical, or strategic level, as appropriate. These plans are rehearsed regularly through a series of live tests and table-top exercises.

OPERATIONAL LEVEL

At the operational level, a Premises Emergency Management Plan (PEMP) focuses our incident management efforts on the safety of personnel on site, and, secondarily, on our physical assets. These measures are to stabilise and assess situations in emergencies like natural disasters, breaches in security, or bomb threats, and meet industry practice.

TACTICAL LEVEL

At the tactical level, our Business and Service Continuity Plan (BSCP) is designed to maintain our critical business processes and IT services. This is to safeguard people, premises, utilities, equipment, and records. The BSCP evolves in step with periodic Plan and Risk Assessments we undertake. Since threats are often geopolitical, we aim to maintain service continuity by collaborating closely with our client governments.

Testing service continuity measures is an integral part of the plan. For instance, we rehearse go-to responses to speed decision-making in real events, and constantly update the details in our response plans. We also strive for continuous improvement in operational collaboration.

STRATEGIC LEVEL

At the strategic level, our Crisis Management Plan (CMP) helps us support client governments when major incidents occur. These have included earthquakes, where premises have been damaged and we have had to move operations to other locations. It is at this level that we also engage with client governments over the possibility of civil or political unrest, or incidents of terrorism.

Our Global Resilience Centre (GRC) aids our efforts to monitor the evolving global threat landscape continuously. The Centre analyses situations for their potential impact and advises on escalation where necessary. It also assures real-time communications with all key stakeholders internally.

CASE STORY



The 2018 floods in Kochi, Kerala in India demanded a real-life disaster response.

When floodwaters disrupted city phones and transportation and threatened employees' homes, the crisis team set up a call tree. This call tree covered Operations, HR, and Corporate Security and Risk teams, with an aim to locate and account for every member of staff, and learn who may need help.

The VACs at Kochi were undamaged, but closed for safety's sake. The crisis team notified and updated client missions and customers by social media. Critical appointments were diverted to VACs in nearby cities. Alternate staff was brought in from Chennai and Bangalore to augment the Kochi team. We organised transport for staff living outside of Kochi, and arranged accommodation for local employees living further away from the VAC. Additionally, back-up staff was moved in from VACs in Chennai and Bengaluru. Dry rations were stocked at the VACs as well. And as PIN codes were unserviceable, passports were held under security for 72 hours, and an alternative supplier was found for doorstep deliveries.

Due to the fast response and smooth workings of the crisis team and disaster plans, skeleton staff could resume operations within 5 days. In spite of the chaotic post-flood conditions, planning and forethought meant over the following week all Kochi operations could resume as normal.

BEYOND COMPLIANCE

Code Of Conduct

As a pioneer and market leader of outsourced visa and consular services for governments worldwide, it is our fundamental obligation to conduct ourselves and carry out business in the most responsible and ethically sound manner.

Beyond the VFS Global Code of Conduct, the Compliance team is developing an Enterprise Risk Management System (ERMS). This is a holistic, corporate approach to managing risk in all parts of the business. The ERMS aids in better understanding of risk, supports sound long-term decision making, and reflects overall corporate strategy.

CODE OF CONDUCT

VFS Global has met the challenges of growth consistently and successfully. The respect and market leadership we enjoy is also due to the commitment, professionalism, and integrity of our employees.

Abiding by the law is our baseline. We also recognise that a proactive, 'Beyond Compliance' approach is a value proposition and differentiator for generating new business. In April 2019, we launched the VFS Global Code of Conduct 2.0, a refreshed, broadened version of our existing code.

The VFS Global Code defines the values, principles, and behaviours expected of every employee. The Code is designed to help our staff make ethical decisions in a culture of openness and trust. It is a resource for situations that are challenging or not previously encountered, and it embeds our values in daily operations.

Every employee is required to complete the mandatory online Code of Conduct training module as part of the on-boarding process. Training assesses employees' understanding of all elements of the Code and its applications. We test knowledge of procedures, reporting mechanisms for any violations, and implications of non-compliance.

CORE VALUES AND PRINCIPLES

Integrity, Commitment, and Entrepreneurship are at our core. These values are spelled out in our Code of Conduct, as are 12 practical principles that place ethics at the centre of daily decisions. Our principles include not tolerating bribery or corruption, speaking up to report breaches of the Code, being fair and courteous with each other, and respecting the cultures and orientations we encounter.

SPEAK UP

We know that speaking up about an incident of concern takes courage. That's why we ask our managers to create a culture of trust, in which employees feel that they are genuinely

encouraged to be open and speak up. The mechanisms for our Speak Up initiative are made very clear in the Code of Conduct and on posters in our offices. Concerns can be taken to any manager, or any supervisor, or to anyone in the Compliance Committee – comprised of the Chief Executive Officer, Chief Financial Officer, Chief HR Officer, and the Head of Compliance. We also maintain a dedicated Speak Up e-mail address. Employees can speak up anonymously or anonymity is guaranteed if they report by name.

All Speak Up cases are assessed by the Compliance team and investigated. The Head of Compliance oversees the VFS Global Speak Up process and reports issues raised to the VFS Global Audit Committee, ensuring good governance. Appropriate disciplinary action is taken (including dismissal) where staff have breached the policy and procedure.

Our Values



COMMITMENT INTEGRITY ENTREPRENEURSHIP



Zero Tolerance to Bribery & Corruption



Speak Up!

LAWS AND GUIDELINES

VFS Global complies with all local and international laws where we operate or where our client governments are. Our operations, products, and services obey the letter and the spirit of those laws. The VFS Global Code of Conduct focuses on 9 particular areas of law (as indicated in the visual on the right side), explains our commitment to them, and articulates detailed employee responsibilities.

Three points emerged from our materiality assessment (page 06) as the most important areas for compliance and beyond compliance efforts. They are: 'Anti-bribery and Anti-corruption', 'Data protection', and 'Anti-human trafficking and slavery'.

ANTI-BRIBERY AND CORRUPTION

Our success depends on trusted relationships with clients and customers. Allegations of bribery or corruption could damage our reputation as well as invite investigation. Bribery and corruption also corrode the economic health of developing countries.

For these reasons and more, VFS Global does not take part in any unethical business. This may mean refusing new business where we detect an integrity risk, or it may mean not using the services of particular consultants or partners.

We strictly require our employees to comply with our Anti-bribery and Anti-corruption procedures.

We conduct a due diligence on our partners, assess bribery and corruption risks in every area of our work, and implement controls to prevent wrongdoing. Employees are asked to report concerns to their supervisors or through the Speak Up channels.

DATA PROTECTION

As the world's largest visa service provider that handles sensitive information of millions of applicants in 150 countries, for 64 client governments, it has always been incumbent on us to have a robust data protection framework. It is crucial for us to be compliant with the data protection regulations of all countries we serve and operate in and in order to be updated, we monitor the development of data protection laws of each of these countries. This enables us to be proactive to ensure that we stay compliant to new laws and also making sure that our processes are effective and don't result in increased administrative burden at the VAC level.

VFS Global already had robust data protection controls even before the GDPR (EU General Data Protection Regulation) came into effect in May 2018. This corporate culture of working with strict controls was helped by having attained ISO 27001 certification for Information Security Management Systems. To support our data protection framework, we also utilise sophisticated cyber security and threat detection tools as the nature of our business demands this.

ANTI-HUMAN TRAFFICKING AND SLAVERY

VFS Global strongly opposes human trafficking, slavery, and the use of child labour. We know that each of these can occur in many forms, and that our systems and controls against them must ensure not only that they do not exist within VFS Global, but that they are absent among our suppliers, or any other parties that work with us.

We ask our personnel to report any and all concerns they may have about this, inside our operations or in our supply chain. They may not support or deal with any suppliers or businesses that they even suspect are involved in slavery or human trafficking. For information about how we approach the UK Modern Slavery Act, please see page 18.

AREAS OF LAW COVERED UNDER VFS GLOBAL CODE OF CONDUCT



1 Data protection and confidentiality laws



2 Anti-Bribery and Anti-Corruption laws



3 Human rights and employment equity laws



4 Anti-human trafficking and slavery laws



5 Anti-discrimination & sexual harassment laws



6 Anti-money laundering and counter terrorist financing laws



7 Copyright laws and software licensing



8 Taxation and finance regulations



9 Insider trading and securities laws

BEYOND COMPLIANCE

International Standards

We are a global company, and we set our standards high wherever we work. We know that our stakeholders value this. We also know that consistency in high standards has value as a business management tool. To this end, we comply with a variety of recognised business standards, against which we are assessed or certified.

Standard, Approach or Regulation	Topic	Importance to VFS Global
	ISO 9001: 2015 Quality Management System	ISO 9000 assesses risks across all processes, and measures results. Internal audits identify process gaps, and these are addressed through a continuous improvement methodology. The outcome is improved business results, including better customer service.
	ISO 27001: 2013 Information Security Management	To ensure our customer information is safe at all times, VFS Global uses its information security management system to implement internationally recognised standards. As part of the process, third party reviews are conducted periodically to measure the effectiveness of our system.
	ISO 14001: 2015 Environmental Management System Certification	We work to reduce our impact on the environment by measuring and managing greenhouse gas emissions, water usage, electronic waste and waste to landfill. We recycle paper and are reducing plastic. We encourage our employees to develop green projects at the local level.
	OHSAS 18001: 2007 Occupational Health and Safety Assessment Series	The health and safety of every employee of VFS Global, our partners and our customers, is a top priority. From assessing VAC design to monitoring and mitigating safety and security incidents, this standard helps us comply with laws in all 150 countries where we operate, and encourages a healthy work-life balance.
	CMMI SVC 1.3 Capability improvement approach	To maintain a leadership position in our industry, we adopted a business excellence model, CMMI framework, to benchmark our processes against industry best practice. Having implemented the model across all our processes up to the micro level, we see improvements in all areas of the business.
	People Capability Maturity Model	As a people-driven business, VFS Global chose PCMM as a road-map for implementing workforce practices to continuously improve employee capability. Each level of PCMM enables cultural transformation through powerful practices for attracting, developing, organizing, motivating, and retaining employees, which results in achieving our business objectives.
	GDPR EU General Data Protection Regulation	We are committed to safeguarding customer and employee privacy, ensuring data protection and maintaining information security in all our processes. We comply with the European GDPR and data protection laws in all our countries of operation. We are proud to be one of the few companies globally that was already compliant with the GDPR when it came into effect in May 2018.

BEYOND COMPLIANCE

Local Laws

INDIA: SEXUAL HARASSMENT OF WOMEN IN THE WORKPLACE ACT

Sexual harassment, predominantly of women, is a world-wide problem. On a human level, it is humiliating and frightening. It also has a negative impact on business as it is divisive and bad for morale.

In India, the government took a strong stance on the issue in 2013 by ratifying the Sexual Harassment of Women in the Workplace (Prevention, Prohibition and Redressal) Act.

Under the provisions of this Act, every employer is now mandated to formulate and implement an anti-sexual harassment policy at the workplace, and to provide security for women employees. Non-compliance can result in a fine, and the revocation of licences and approvals for doing business.

Selected requirements of the Act include:

- A safe workplace
- Regular workshops and awareness programmes to sensitise employees
- Orientation programmes for the Internal Complaints Committee
- Visible display of the list of penal consequences of sexual harassment

VFS Global has a zero-tolerance attitude to sexual harassment. VFS Global India has developed its own Prevention, Prohibition

and Redressal of Sexual Harassment at Workplace Policy. This exceeds the requirements of the Act, guaranteeing that at VFS Global India:

- People of any gender may not be harassed
- People working under any employment arrangement may not be harassed, whether their presence is permanent, temporary, direct or through an agent, or voluntary
- People may not be harassed when they are off-duty, or harassed by a third party

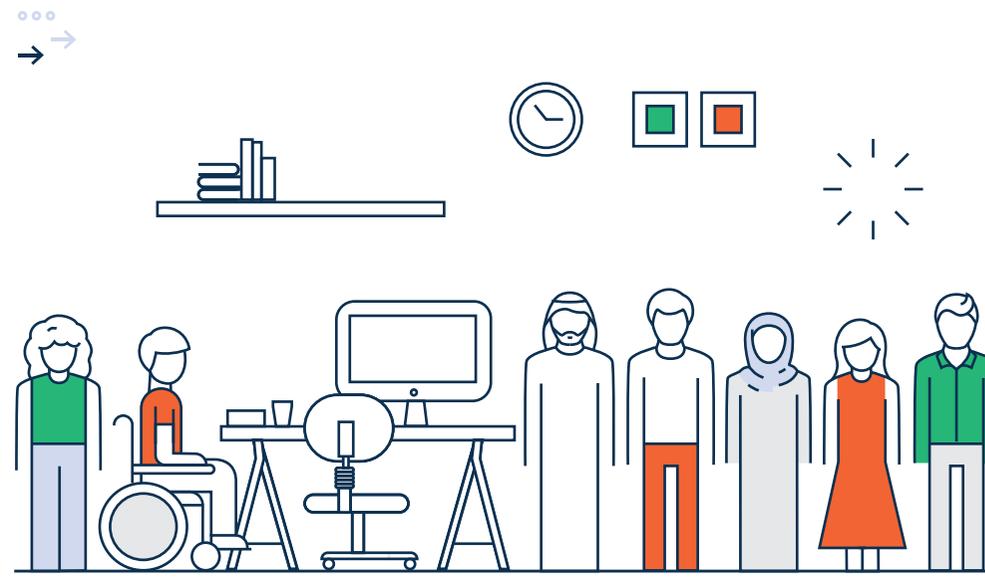
We also comply with the Act's requirement to report annually on progress and any incidents relevant to the Act.

In addition, our VFS Global Code of Conduct includes a dedicated section on 'Sexual Harassment' in the workplace, which is applicable to all employees worldwide.

INDIA: CORPORATE SOCIAL RESPONSIBILITY

In 2014, India became the first country in the world to make corporate social responsibility, or 'CSR', mandatory, by an amendment to the Companies Act, 2013.

Under this Act, all companies above a specific net worth, turnover, or profit are required to spend 2% of their average net profits over three years on CSR. Project areas in which



this CSR money may be spent include promoting education, protecting the environment, eradicating hunger, poverty, and gender inequality, among others. VFS Global India invests in protecting the environment and promoting education, in alignment with its global CSR strategy.

Since 2014, VFS Global Services India Private Limited has been 100% compliant with the Act, and actually exceeds the CSR requirements by investing in sustainable projects aligned with its focus areas. Among other initiatives, we support a bio-gas project in Kolar, Karnataka (India), benefitting over 8,000 families (see P. 24), and a holistic education programme in a Mumbai Public School serving close to 500 children.

UK: MODERN SLAVERY ACT

VFS Global has a zero tolerance approach to Modern Slavery within its operations and supply chains and encourages its staff to report related concerns and incidents using the escalation matrix available across the organisation.

The VFS Global Policy under the UK Modern Slavery Act 2015 reflects the company's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the countries we operate in.

PEOPLE

Employees

VFS Global wants to be an employer of choice. Today, that means more than just offering employees a good salary, a friendly work environment, and good training. Our people want to know how we address the things that will affect their futures. That's why integrating sustainability into people management matters so much to us.

EMPLOYEES

Currently, VFS Global employs more than 11,000 people, and that figure is growing. Respect for each other is central to our working culture as is personal development. These values are important to our personnel, and our latest annual employee engagement survey, EMPOWER, shows consistently high scores in diversity of thought.

The EMPOWER survey is conducted every year to provide our employees with an opportunity to freely and honestly express their views and to provide the management with feedback on various aspects that impact their satisfaction levels at the workplace. In 2019, more than 6,000 employees were eligible to participate in the survey. The overall engagement score was 65%, an increase of 3% over 2018, which is near the top quartile of IT/ITES and higher than the median.

DIVERSITY

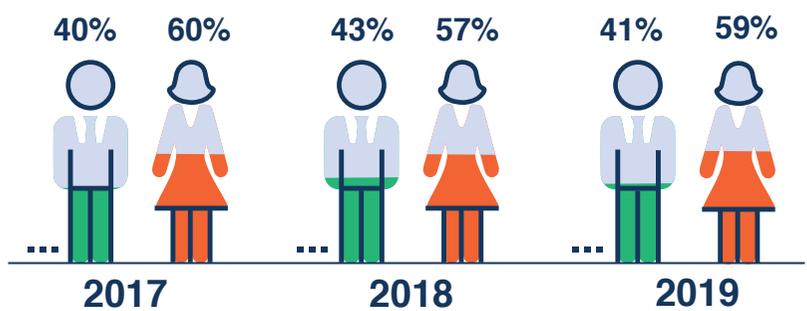
Diversity of thought is the essence of a healthy, entrepreneurial organisation, and our diverse culture is an important driver of our success. 139 nationalities work with VFS Global, bringing the benefit of a wide variety of world views. Our gender balance, standing at 59% female and 41% male in 2019, shows a shift towards women, with figures of 57% and 43%, respectively in 2018.

LEARNING AND DEVELOPMENT

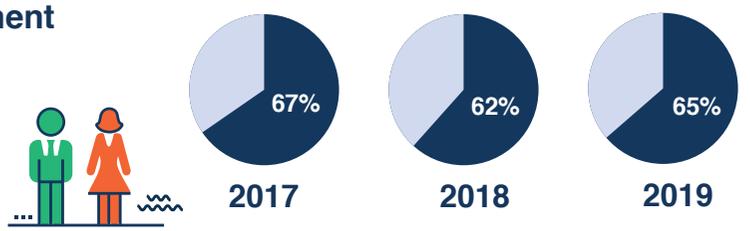
Learning and development initiatives at VFS Global are closely aligned with our business objectives. We give each new hire six mandatory training modules that must be completed within a month of joining. Topics within these modules include the VFS Code of Conduct, data privacy, corporate security, IT security, and anti-bribery and corruption. (See Beyond Compliance pages 15 and 16).

We don't stop there. Because our business is fast-moving, we constantly train, and retrain, our people in core competencies that best match our evolving business goals. We achieved PCMM level-5 management certification in 2019, (see also page 13) and an audit by KPMG shows a correlation between this achievement and meeting our operational targets.

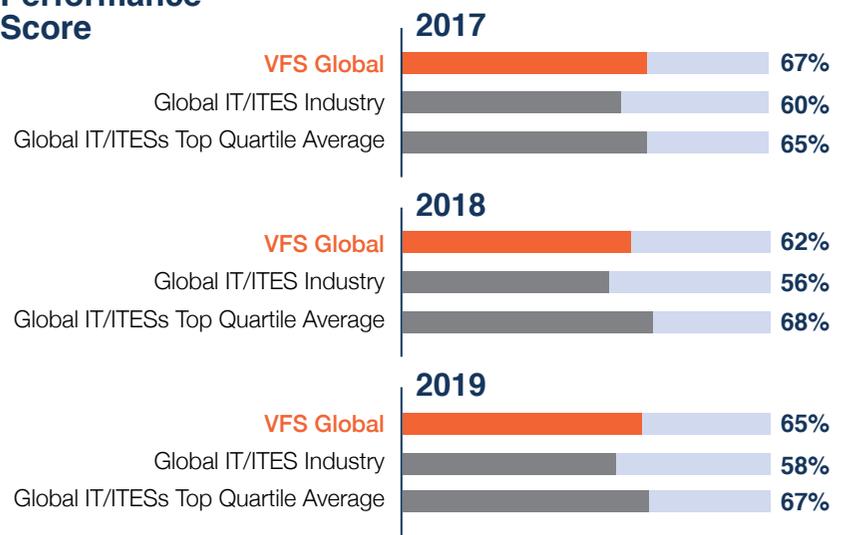
Gender Diversity



Employee Engagement Score



Performance Score



Personnel who achieve higher scores in customer-service training, for example, receive better feedback from client governments and customers. Clearly, our investment is paying off.

We understand that soft skills are an essential focus for training in our business. Besides customer service, these include entrepreneurship, networking, relationship management, communications, and escalation management.

To support our people in soft skills, VFS Global has developed a range of learning tools for every level of seniority. These include:

- **Management Development Programme:** A two-week course on entrepreneurship and focused topics in IT, HR, Finance and Business Development, with a real-time project component. Annually, this course is taken up by top-performing managers from across the regions who are due for taking up leadership roles in the organisation. In 2019, the programme was attended by 32 participants. Participants found that they were indeed more effective in thinking innovatively, and gained entrepreneurship and leadership skills after attending.
- **InstaLearn:** A learning combination of videos, on-the-job training, case studies, and experience sharing. This is especially practical for ongoing learning, because it integrates with real work tasks. We offer this in 5 languages: English, Arabic, Russian, Mandarin, and Spanish.

- **VideoTube:** Our own self-paced learning portal, full of training videos (77 so far). These cover topics like process knowledge, best sales practice, and customer service soft skills. In the first three months, the system registered 14,500 viewings.
- **Mentoring:** Focused interventions for preparing promising managers for senior roles in the organisation. About 50 employees went through this programme in 2019. It is envisaged that in time, these individuals will themselves be mentors for rising talent.
- **Leadership Development Programme:** An advanced management course for top-level personnel. About 25 members from VFS Global's senior leadership team attend this course every year.

HEALTH AND SAFETY

Our business takes place in an office-based environment. We ensure everyone's ergonomic comfort with suitable chairs and work surfaces, correct illumination, and proper climate control. We also make sure our facilities are clean, and that the water is safe for drinking.

For the physical safety of our staff and customers, we also security-check our premises constantly, at all locations (see 'Resilience', page 08), and we make sure that all staff receive security training as part of their HR on-boarding.



MEETING CHALLENGES

- Traditional, lengthy, class-based learning is less suitable for many of today's employees than focused fast-track courses in specialised skills. To address this, beyond our digital offerings, largely at the Submission Officer level, we partner with a variety of colleges and institutes to arrange custom-built courses, contextualised by region. One example is the tailored MBA at the University of Buckingham UK, for which select employees win sponsored places.
- Our diversity, which we feel is a company strength, also poses challenges. Across the globe, for example, 'customer service' may mean many different things. One way we have addressed varying cultural sensitivities is by contextualizing our digital learning offerings by region.

PEOPLE

Customers

Customers rightly expect service from us that is efficient, smooth, and friendly. We review this constantly, focusing especially on the challenge of keeping the quality high during peak times. No one likes to be kept waiting and our ethos is to respond quickly to requests and take ownership of any problems, should they arise.



Built into our Service Level Agreements with client governments are clear targets for responding to customer queries or complaints. We require that all e-mail correspondence within our control be closed within seven calendar days, or within two weeks if another party is involved. Social media contacts are to be acknowledged within 30 minutes, and closed within 72 hours. For managing complaints, we use a clear 5-step Resolution Matrix, developed for just this purpose.

We measure more than the speed of our responses to customers. We also assess their quality, through insights that come to us from our 'Voice of Customer' initiative. Our Customer Care team analyses e-mail and social media communications closely, and shares what they find with client governments, wherever applicable.

CUSTOMER FIRST

'Customer First' is a new initiative for enhancing our customer care culture across the organisation and to address peak season

challenges with large numbers of application volumes, using digital and non-digital platforms.

While 'Customer First' is working behind the scenes, we're also deploying newly recruited Customer Experience Managers, who work directly with the people who come into our busy centres. Their job is to help customers personally with concerns, and proactively support a smooth application process.

SOCIAL MEDIA COMMAND CENTRE (SMCC)

As part of our Customer Care proposition, VFS Global has implemented a 24x7 real-time Social Media Command Centre, which is powered by 'ONE DIRECT', an omni-channel platform. Implemented in November 2019, the application brings a structured approach to our customer listening, engagement, and media channels.

The platform will also support the phased integration of customer feedback forms and channels that we use at our VACs.

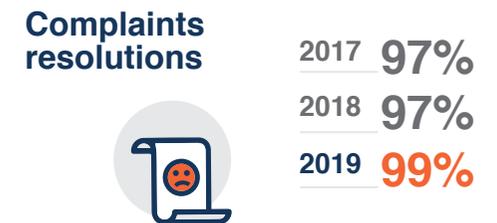


This will bring synergy and record the effective handling time of customer communications within a pre-defined Turnaround Time (TAT). Additionally, our client governments will benefit from the data and analytics generated by the platform, which will enable them to study and assess specific feedback.

MEETING CHALLENGES

During peak season, the number of applications per day increases significantly. To address the higher footfall at application centres, we have further strengthened our capacity planning, adding more employees to serve customers at the VACs. Dedicated Customer Experience (CX) Managers supervise the customer flow and waiting times. Customers can address issues directly to a CX Manager to get a resolution as early and as fast as possible during the submission process at a VAC.

Online appointment systems and visa application websites are 'stress-tested' prior the peak season to simulate the increased data and information load on websites to ensure a fast and smooth online appointment and application process during the peak months of the year.



PEOPLE

Engaging Stakeholders

At work, we focus on serving client governments and customers, but our impact on society is much wider. We take our responsibilities towards the communities around us seriously. Many of our employees, customers, and suppliers live locally, and so this is simply good business. And of course, it's also the right thing to do.

While employees are encouraged to volunteer their time during weekends, we also provide two full days off for employees to volunteer for community support activities. We include a few examples of our engagement activities below.

AKANKSHA FOUNDATION

Children from underprivileged backgrounds need access to education. To this end, since 2015, we have supported the Shindewadi Mumbai Public School in partnership with the Akanksha Foundation. More than 500 students have benefitted from the programme under our sponsorship to achieve a 100% pass rate in their 10th grade exams. This is a lifeline to their future.

IFTAR MEALS

In the United Arab Emirates, across Dubai, Abu Dhabi and Sharjah, we joined with local VFS Global employees to raise money for 3,000 Iftar evening meals for visiting workers who were living in field accommodation. Together, we raised AED 30,000, and 50 of our employees also volunteered to go to the

campsite and physically prepare and distribute these meals.

APPRENTICESHIP PROGRAMME

In India, we adhere to the Government's Apprentice Act, which aims to ensure apprentices/ trainees receive a stipulated level and period of training that will equip them for a supervisory level role once complete. We are in the process of on-boarding new apprentices across India, in data entry roles. These apprentices will be paid and trained according to and/or above the measures required by the Act.

SAUDIZATION

Building on the Saudi government's Saudization initiative, which aims to increase employment of Saudi nationals in the private sector, VFS encourages Saudi student interns to opt for career paths within our organisation. To date, VFS Global has hired over 60 qualified Saudi national interns. VFS Global's Saudization internship programme begins by identifying interns' competencies and providing training to improve their skill sets. At the end of training, interns receive a report of their achievements.



DADOBRO

In Russia, our volunteer and employee initiatives are conducted under the International Volunteer Movement, DaDobro. Supported by VFS Global, DaDobro (joining two Russian words 'Da' meaning Yes and 'Dobro' meaning Good), acts as a bridge between the community needs and corporates.

DaDobro fosters a socially-oriented corporate culture and operates in 5 countries – Russia, Belarus, Kazakhstan, Uzbekistan, and the UK. In 2019, our initiatives witnessed participation from more than 700 employees across 80+ corporates in over 50 cities.

With round-the-year activities, DaDobro follows the 'Good Deeds Calendar', where each month is dedicated to particular a theme including education, compassion, environment, sports & wellness and animal-welfare among others.



CASE STORY



TAKING A STEP TOWARDS CLEAN INDIA

Aligned with the Swachh Bharat, Swachh Vidyalaya Abhiyan (Clean India, Clean School Mission), our employees in India, under the recently launched employee volunteering programme titled 'Champions of Change', took up school transformation drives across Mumbai, Delhi, Chennai, Bengaluru and Kolkata. This initiative tied-in very well with our education and environment themes, while demonstrating our support to the national agenda. 419 volunteers took up cleaning and greening activities at 5 schools, benefiting more than 2,000 students and clocking over 1,350 service hours!

ENVIRONMENT

Reducing Our Footprint

People, businesses, and economies need a healthy environment to prosper. At VFS Global, we aim to reduce our impact on the environment wherever we can. Caring for the planet is the natural thing to do. In the short and long term, it benefits our business, our clients, and our customers.

CARBON FOOTPRINT

We know that global warming is one of the biggest challenges of our time. Scientists are clear that only by reducing carbon emissions, starting now, can we hope to keep climate change in check.

To understand our own impact, we gather data about our energy use. Last year, we calculated the direct and indirect greenhouse gas emissions from all our offices and VACs, and from our business travel.

In 2019, we emitted 20,176 tonnes of CO₂e, or carbon dioxide equivalent. 4,918 tonnes of this was from air travel, which was higher compared to 2018 due to business growth. The company's business related flights are offset and therefore carbon emission neutral. VFS Global collaborates with the Swiss non-profit organisation 'myclimate'.

In 2020, we aim to develop an action plan, with targets to reduce our building emissions in a systematic and measurable way. We will explore purchasing renewable power for VACs and offices. This will complement our long-standing commitment to offsetting our business travel.

WATER

VFS Global is conscious about consumption of natural resources. While the nature of our business is such that we primarily consume water for drinking and sanitation purposes only, we feel it is important for us to conserve water starting with the way we manage water in our facilities.

While there cannot be a limit set for drinking water, we have taken adequate steps to provide guidance, training and visual reminders to our employees on how to minimize unnecessary water use and reduce wastage. Left over water from RO filters and dispensers is used in planters within the offices and VACs.

Other initiatives like introduction of dry urinals at VACs, installation of water-efficient fixtures in restrooms, hand-wash areas, or staff rooms, and compulsory daily checks for water leakage, among others, have helped us significantly reduce our water usage in 2019.

WASTE

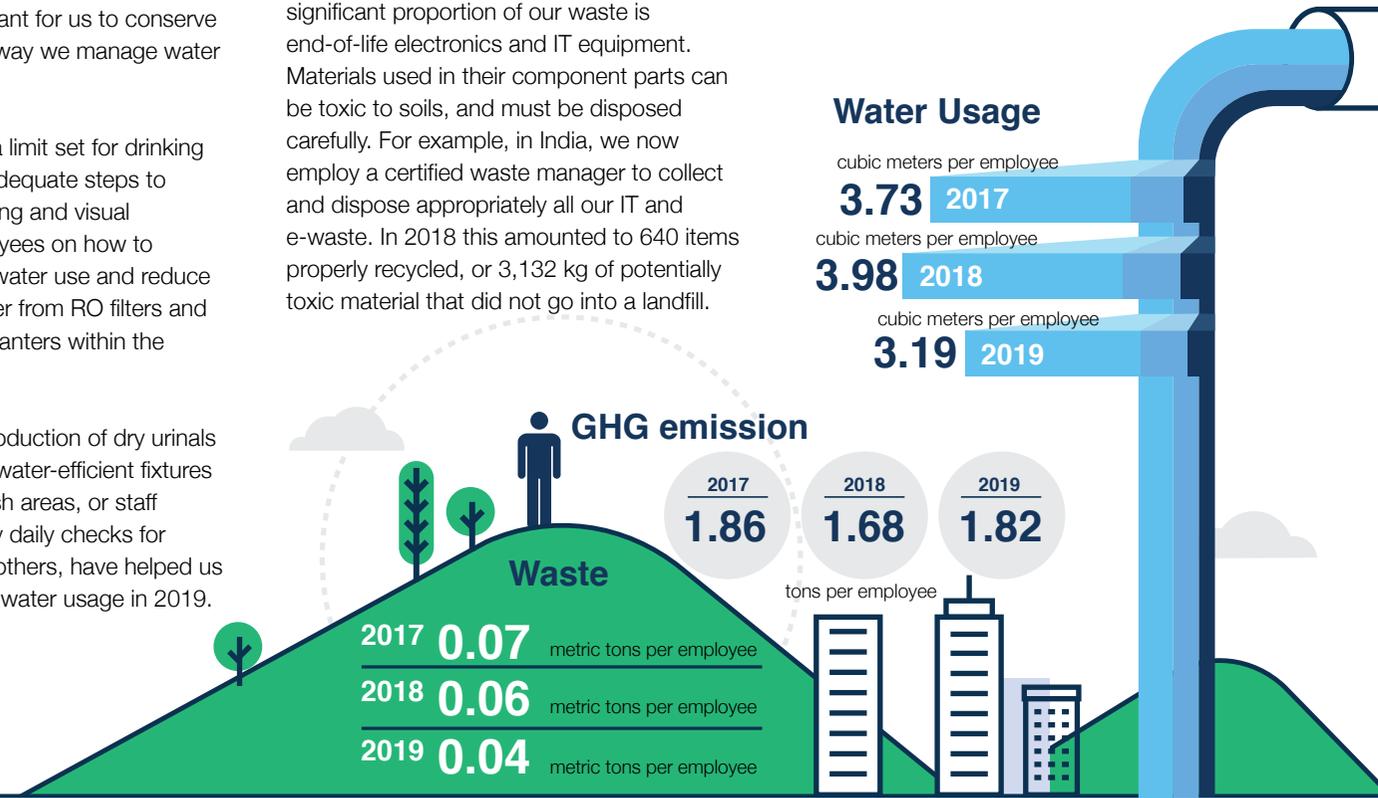
VFS Global produces little waste, not being a manufacturer. But we do produce some, and our aim is to recycle as much as possible, measuring carefully what goes to landfills. The amount currently is 427 tonnes, reduced from 558 tonnes in 2018. In 2020, we intend to put in place a plan to develop a company-wide waste management strategy, starting with a pilot project with removing all plastic bottles from one of our larger VACs in the UAE.

RECYCLING

Like most office-based organisations, a significant proportion of our waste is end-of-life electronics and IT equipment. Materials used in their component parts can be toxic to soils, and must be disposed carefully. For example, in India, we now employ a certified waste manager to collect and dispose appropriately all our IT and e-waste. In 2018 this amounted to 640 items properly recycled, or 3,132 kg of potentially toxic material that did not go into a landfill.

RECYCLED MATERIALS

Using recycled paper saves resources like water and energy, and reduces landfill waste. In 2018, we made the decision to print Connect, our quarterly magazine for client governments, on recycled paper. We issue 3,500 copies of the publication four times a year. This is a good way to reduce our impact and stimulate the market for recycled material. In 2020, we will limit our print run to 1,000, to encourage more digital reading and aim to move Compass, our customer magazine, to recycled paper.



ENVIRONMENT

Green Initiatives 2019



BIOGAS IN KOLAR NEAR BENGALURU, INDIA

In some parts of the world, access to energy is difficult, particularly for poor populations.

To help improve access to clean, efficient, and renewable energy, VFS Global has partnered with the Swiss non-profit organisation 'myclimate' to fund a biogas project in Kolar, India. This project helps install biogas plants that now produce clean energy for the local population – about 8,000 families, or 40,000 people. Our investment helps us offset all the carbon emissions that our business flights generate - an amount we estimated at 4,918 tonnes in 2019.

The project benefits the people of Kolar in multiple ways. Reduced use of kerosene and

firewood for cooking means the air people breathe is cleaner now, resulting in fewer respiratory problems. There is less pressure on the local forests for firewood harvesting. (The project removes the need for an estimated 4.5 tonnes of wood per household every year). Local women and children, who would normally collect wood, are now free to go to work and school – an especially important change, because educating girls is known to be one of the best ways of enhancing economic development and tackling climate change. Farmers benefit too, because they can use waste slurry from the biogas system as a soil improver, and do not need to buy chemical fertilisers. And of course, greenhouse gas emissions are down, there being fewer wood fires in people's homes.



EMPLOYEE INITIATIVES

Learning to care for the environment requires culture and habit changes. VFS Global puts great effort into creating hands-on conservation projects for our employees all around the world. These projects are also excellent for team-building. In 2019, our people took part in over 60 community and environmental activities. Three of these were inspired by VFS Global employees in Russia, India, and China



APPLES FOR BATTERIES RUSSIA AND EASTERN EUROPE

Because batteries contain toxic materials, damaging to soils and waterways, we launched a battery collection drive across 35 cities in Russia, Belarus, Estonia, Kazakhstan, Cyprus, and Romania. In total, we saw to the proper disposal of 2,400 kg of used batteries. And the result? We calculate that 960,000 litres of water and 48,000 square metres of land were not contaminated by dumping these batteries into landfills. All those who brought in used batteries were presented with a green apple as recognition for their contribution.

USED SHOE COLLECTION DRIVE MUMBAI, INDIA

Many of us take shoes for granted, and forget that those without this basic necessity are faced with significant physical and cultural disadvantages. For this reason, we organised a Used Shoe Collection Drive in Mumbai, India. Collected shoes were upcycled by Greensole, a non-profit specialising in making refurbished shoes from old soles – with zero carbon footprint. Refurbished shoes were given to children in need. Our efforts helped put shoes on their feet and also offset about 300 kg of CO2 that would have been emitted from manufacturing new shoes.

SOAPS FROM WASTE BEIJING, CHINA

It's never easy to know what to do with the remnants of a bar of soap. But 45 people from our Beijing VFS team found out when they joined a local GoZeroWaste initiative and learned how to make soap out of gathered waste material. The project was enlightening for everyone involved, and it helped raise public awareness of just how much we can do to live more responsibly on our planet.

ECONOMIC CONTRIBUTION

Business Benefit to the Society

Travel is a catalyst that has the potential to impact lives in multiple ways. It generates economic growth and work opportunities globally, even in remote and inaccessible areas.

Through employment, training, supporting local businesses, and our tax contributions, we support people and the economies of the communities and countries where we operate.

We employ over 11,000 people in 150 countries, providing valuable income to staff and their families. Indirectly, we make financial contributions to a large ecosystem of service providers such as couriers, drivers, and other support staff who help us keep our business running smoothly.

The positive impact of VFS Global on emerging economies is strong. Our learning and development programmes provide employees with training that's highly valued, especially where access to further education can be expensive. Local travel agents in particular benefit from the opportunity we create. They provide visa application preparation services to support customers before they arrive at a VAC. In certain countries such as Lesotho and Zimbabwe, we have a direct impact on creating opportunities for those eager to work. Here we collaborate with governments to facilitate

work permits, enabling thousands to support themselves and their families.

Our business, providing outsourced visa application and consular services to client governments and customers, is efficient and delivers high levels of customer satisfaction, see more page 04. It helps to give more people the opportunity to move between countries - in itself a powerful economic driver. According to WTTC (World Travel & Tourism Council), in 2018, travel and tourism contributed USD 8.8 trillion to the world economy, creating 319 million jobs across the globe, with a forecast of 400+ million jobs to be created by 2029. On the other hand, we recognise that travel growth can have downsides such as environmental impacts.

VFS Global is committed to contribute within its range of influence and beyond to limit these impacts as much as possible.





TAX AS A KEY ECONOMIC CONTRIBUTOR TO THE SOCIETY

TAXATION APPROACH

As a company, we are committed to ethical business practices and to respecting local laws in the territories where we operate, and this has a direct bearing on our approach to taxation. We are committed to compliance with the tax laws and practices in the countries in which we operate and have implemented robust governance processes to enable us to do so. Based on pre-determined guidelines, escalation mechanisms are in place within the company with respect to key tax matters / risks, including reporting to the Chief Executive Officer or Chief Financial Officer of the company, or the Audit Committee or the Board, as required. The company has always maintained a cooperative and collaborative relationship with tax authorities and will continue to do so.

ATTITUDE TOWARDS TAX PLANNING

All tax risks are identified and considered before concluding on any business decision. The tax decisions are made in response to commercial activity and tax is just one of many factors taken into consideration when making such decisions. It is our endeavour to use automated technology to track tax related compliances in various operating jurisdictions and also modify, alter, and create technology used in operations for easy and accurate implementation of tax reforms, wherever possible.

TAX RISK MANAGEMENT

We have a minimal tax risk tolerance as a company. We are committed to compliance with the tax laws and practices across all the countries we operate in, and continuously monitor changes to tax legislation, ensuring that we take advice where appropriate from professional advisers. The level of tax risk that we accept is driven by our overarching values, brand, and reputation. We routinely seek professional advice where specialist tax knowledge is required.



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