



## Duty of Care for International Travellers and Expatriate Employee

Advice to help you fulfil your legal obligations and mitigate reputational, financial and operational impacts.

<b>Introduction by Chris Job MBE, Drum Cussac COO</b>	<b>03</b>
<b>Section 1: Duty of Care overview</b>	<b>04</b>
What is Duty of Care and why does it matter?	05
The legal context	06
Costs versus benefits	07
<b>Section 2: Approaching Duty of Care for your organisation</b>	<b>08</b>
The main priorities	09
A cross-functional approach	09
Joining up knowledge and resources	10
Weighing risk	10
Decision making - framework and evidence	10
Putting theory into practice	11
Empowering travellers	12
Employee location and communication tools	13
Expectations and limitations	13
Summary	13
<b>Section 3: Drum Cussac</b>	<b>14</b>
How we can help you to fulfil your Duty of Care	15
Our services	16
Case study: client evacuation from Fiji	17

## Introduction

// Duty of Care touches so many areas of everyday life, from the food that we buy to our overall well-being via pretty much everything in between. It is inescapable and rightly so.

Defined as ‘the moral and legal responsibility of a person or organisation to avoid any behaviours or omissions that could reasonably be foreseen to cause harm to others’, the Duty of Care principle has two foundation stones in statute and common law that set out obligations and consequences if breached.

If statutes are breached, sanctions range from custodial sentences for Directors to fines, compensation and publicity orders. With regard to common law, damages for personal injury are unlimited and cannot be contracted out of.

With the stakes so high, it’s clearly important for organisations to do everything in their power to fulfil their Duty of Care obligations. But this isn’t always the case.

In the world of travel risk management, studies indicate that almost two-thirds of Business Travel Managers believe the risks their travellers face will increase in the coming year. Yet, despite this, almost a third (28%) of companies don’t have a robust travel risk management program or their staff are unsure if one exists.

Without a robust risk management plan, it can be exceptionally challenging to fulfil your Duty of Care. A lack of transparent policies and procedures can result in legal grey areas that can lead to trouble further down the line, especially if you have vulnerable travellers or allow bleisure travel.

While there is a clear legal requirement to have a comprehensive travel risk management program, it isn’t the only reason to comply. Committing to ensuring your Duty of Care can be pivotal in recruiting and retaining the best people, increasing output and encouraging a positive and productive atmosphere for employees - all vital to a successful business. It is in this environment that duty of loyalty will thrive and where your people will show similar levels of commitment and compliance in return to the company.

In this whitepaper, we highlight some of the key issues and challenges in ensuring Duty of Care and the implications for organisations with international travellers and expatriate employees. We offer advice and guidance from our extensive experience of travel risk management, gained in protecting millions of lives and thousands of operational facilities in some of the world’s highest risk environments.

In short, if we all take reasonable precautions against foreseeable risks then we shouldn’t go too far wrong. Not only is it common sense, it’s the law.

Chris Job MBE

---

Drum Cussac, COO



Section one

# Duty of Care Overview

## What is Duty of Care?

As an organisation, you have a moral and legal obligation to your employees to ensure their safety. Regardless of whether your people are in the office, working from home or travelling for business, it is essential that you have the policies, procedures and systems in place to fulfil your Duty of Care.

Without these systems in place, you're potentially putting your people and organisation at risk of negative impacts down the line. This makes it vital for organisations to understand the scope of their obligations.

Duty of Care goes beyond having travel insurance, or getting travellers home safely after an earthquake, terror attack or some other worst case scenario - it extends into any and all challenges that could affect an employee's well-being each day.

### Why does Duty of Care matter?

Demonstrating concern for employee wellbeing shouldn't be seen solely as a legal obligation - there's a strong business case too. Actively reassuring employees of your support can help boost both mental and physical health, improving productivity and engagement across the organisation.

This in turn can encourage employee loyalty, attract top talent and improve retention, which can lead to long-term productivity improvements and results. Likewise, affording employees your full-support when travelling for business can reassure them and help to minimise stress, mitigate risks and ultimately improve the results of a trip.

It's important to note that employees also have a responsibility to ensure their own wellbeing at work and are entitled to refuse tasks or requests that aren't safe without fear of disciplinary action. This puts the impetus on your organisation to ensure protective systems are in place, because if tasks are unsafe and employees refuse to complete them then this can impact your operations and profits.

Employment laws aside, the business case for Duty of Care is strong and wide-reaching. It affects every part of your organisation and the financial, reputational, legal and operational impacts of failure can be severe and irreparable.

**At the most basic level, you can fulfil the majority of your legal Duty of Care obligations by:**



Providing a safe work environment



Completing risk assessments for job roles and facilities



Providing any necessary training



Protecting employees from harassment, bullying and discrimination



Ensuring employees don't work excessive hours



Maintaining open lines of communication to hear employee concerns

## The legal context of Duty of Care

Legislative developments and changing attitudes to corporate responsibility have had a big impact on the way organisations view and manage their exposure to risks. In the UK, the roots of Duty of Care can be traced back to at least the 1970s, with the 1974 Health and Safety at Work Act, which focused specifically on workplace safety conditions and facilities.

Over the years, the legislation has evolved to take account of growing complexity in the world of work, including greater mobility, opportunities for international travel and an increasingly global marketplace.

The 2007 UK Corporate Manslaughter and Corporate Homicide Act has perhaps been the most radical legislative change, placing the onus on individuals as well as organisations and dramatically intensifying the implications of Duty of Care failures.

While the human implications of death or injury are all too apparent, the liability implications in terms of director and manager culpability are also potentially life-changing. Six or seven-figure fines are becoming the norm in serious Duty of Care litigations, with criminal charges resulting in a prison term if senior personnel are deemed to have been negligent or are unable to demonstrate that they have taken reasonable precautions.

It's worth noting that Duty of Care obligations and liability apply equally to home country or overseas activities. In our experience, however, the likelihood of an incident occurring is multiplied when international travel is involved, especially where the organisation has minimal or no in-country presence. With this in mind, it's hardly surprising that travel risk management is receiving so much discussion and debate in the boardroom.

## Duty of Care and business travel

Does duty of Care cover business travel?

This is the question at the heart of the landmark 2015 case of *Dusek v StormHarbour Securities LLP*, in which a fatal accidents claim was brought against the late Mr Dusek's employer by his widow and child.

Mr Dusek was killed while travelling by helicopter to a project site in the Andes mountains, Peru. This was in the course of his employment and so it was within StormHarbour's Duty of Care to take all reasonable steps not to expose him to unnecessary risk.

The court found that:

- Flying at high altitude, in bad weather and in a remote region of the Andes is inherently dangerous.
- StormHarbour failed to make any safety inquiries and failed to carry out a risk assessment for the trip.
- Had the necessary risk assessment been carried out, the journey would have been deemed too dangerous and Mr Dusek would not have been asked to travel to the site.

StormHarbour breached their duty of care to Mr Dusek and were found to be responsible for his death.

## Duty of Care: costs vs benefits

Despite being a legal obligation, fulfilling your Duty of Care is going to cost you money. That is an unavoidable fact. However, the caveat here is that the cost of investing in Duty of Care significantly outweighs the costs of failure, which go beyond mere profits and can have long-lasting effects on your organisation and how it is perceived.

The graphic below breaks down the costs versus the benefits of fulfilling your Duty of Care:

Impacts	Benefit	Cost of failure	Business mitigation cost
<b>Your employees</b>	<ul style="list-style-type: none"> <li>Ensure wellbeing</li> <li>Improve mental and physical health</li> <li>Improve morale, loyalty and productivity</li> <li>Attract and retain top talent</li> </ul>	<ul style="list-style-type: none"> <li>Injuries, mental and physical distress, loss of earnings or even loss of life</li> <li>Medical expenses</li> <li>Decline in morale, loyalty and productivity</li> <li>Loss of experienced employees</li> <li>Recruiting and onboarding new employees</li> <li>Sick pay</li> <li>Risk management expenses (e.g. evacuation)</li> </ul>	<ul style="list-style-type: none"> <li>Compliance + training</li> <li>Implementing effective risk management plans</li> <li>Security risk management technology</li> </ul>
<b>Your operations</b>	<ul style="list-style-type: none"> <li>Maintain operational continuity</li> </ul>	<ul style="list-style-type: none"> <li>More downtime and operational interruptions</li> <li>Decline in profitability</li> <li>Diversion of resources and personnel</li> </ul>	<ul style="list-style-type: none"> <li>Insurance</li> <li>Implementing effective risk management plans</li> </ul>
<b>Your organisation</b>	<ul style="list-style-type: none"> <li>Improve reputation</li> <li>Improve public perception</li> <li>Risk management-driven insurance discounts</li> </ul>	<ul style="list-style-type: none"> <li>Damage public perception</li> <li>Reputation damage</li> <li>Falling investor confidence</li> <li>Increased insurance premiums</li> <li>Loss of stakeholder bonuses</li> <li>Fines, penalties, litigation and liability damages</li> <li>Stakeholder Incarceration</li> <li>Bankruptcy</li> </ul>	<ul style="list-style-type: none"> <li>Insurance</li> <li>Implementing effective risk management plans</li> <li>Security risk management technology</li> </ul>



## Section two

# Duty of Care best practice



## The main priorities

Whether responding to a major crisis event or planning a routine overseas trip, effective Duty of Care requires a range of integrated policies, processes and relationships.

You not only have to do the right thing; you have to be seen to do the right thing and there are serious legal and financial implications if you don't.

## A cross-functional approach

For corporate, academic, institutional and NGO sector organisations the top priority is – or should be – the safety and security of your personnel. Ensuring lives, limbs and the

wellbeing of personnel in the office and abroad, regularly features prominently in strategic reviews and vision statements.

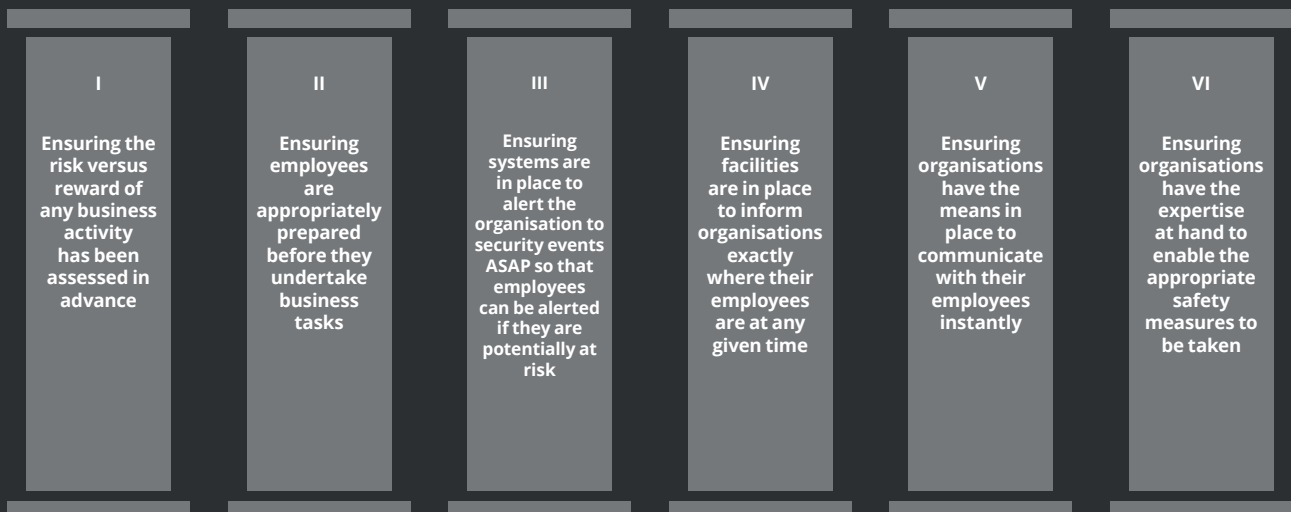
Duty of Care does not sit in an isolated 'silo'. It spans multiple parts of the organisation and requires processes and systems that link functions such as operations, security, risk management, travel, HR, legal and insurance.

Given the number of people and departments that necessarily become involved with Duty of Care, the ownership of risk management tools within organisations can sometimes become blurred, resulting in tools that are not used to their maximum potential.

In our experience, Duty of Care is most effectively provided when ownership and roles are clearly defined, and where communications are effective between departments.

## The six pillars of Duty of Care

As a simple guide, when weighing up Duty of Care, there are six main pillars that organisations need to consider:



By meeting these six fundamental requirements, organisations will be on the right track to ensuring that their Duty of Care obligations are met.

## Joining up knowledge and resources

Here are some examples of internal issues that make can make your response to an incident more challenging than it should be:

- The function coordinating a crisis response is unaware of the extent of response provisions the organisation can draw upon
- Employee locating systems do not give the complete picture of their whereabouts
- Emergency messaging systems upon which response processes are built are not designed to take account of external damage to infrastructure
- Planning and coordination have been neglected or untested

Organisations that approach Drum Cussac for support, express their wish to minimise the likelihood of any harm befalling any employee, contractor or other individual for whom they have full, direct or implied responsibility. However, we find that despite having introduced processes and mechanisms to support Duty of Care, very few have anywhere near a perfect global solution.

Rigorous planning and enacting various scenarios are critical to ensuring the organisation and its service providers are best prepared to react appropriately should a Duty of Care emergency arise.

It's important to stress that Duty of Care is not a one-off exercise or a box to be ticked. Creating a policy is not enough; rather, Duty of Care is a journey. Regardless of their size or scale, all the organisations we work with are continuously looking at ways to enhance the resilience and cohesion of the systems and processes they rely on to safeguard their people worldwide.

## Weighing risk

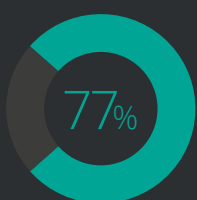
The increased incidence of political evacuations in recent years and the high-profile cases of kidnap for ransom that hit the headlines mean that they rightly feature prominently on many security risk registers. They pose major Duty of Care challenges when they do occur and are increasingly covered by special insurance policies and crisis management protocols.

However, the likelihood of events such as these occurring is relatively low for most organisations. Road traffic accidents and exposure to criminal activity pose the highest threats to personal safety in the majority of countries worldwide. Moving an individual or small group of travellers between airports, hotels, meeting locations, social events and remote worksite locations under relatively normal operating conditions in countries and cities of 'moderate risk' can be a hazardous business.

In summary, while not as dramatic as kidnap for ransom scenarios, the routine movement of international travellers presents organisations with significant Duty of Care challenges.

## Decision making – framework and evidence

Establishing travel risk management policies and processes to govern the diverse and dynamic travel requirements of international organisations is a huge challenge. Once in place, these policies and processes must be subject to continuous review of risk, reward and cost. This process in itself should be documented and supported by justifications as to how travel approval was granted.



77% of businesses are not confident they can locate employees in an emergency

Source: Concur

## Threats to travellers

<b>Man-made</b>	<b>Terrorism</b> (inc. piracy and kidnapping)	<b>Crime</b> (inc. theft, threats, opportunistic, organised and violent crime)	<b>War</b> (inc. civil unrest, coups and insurgency)	<b>Infrastructural</b> (inc. damaged roads, poor quality buildings, poor air quality and fires)	<b>Cultural</b> (inc. can't speak the local language, prejudice and preconceptions)	<b>Vehicular</b> Vehicular (inc. road accidents, hijackings and calamities)
<b>Natural</b>	<b>Disasters</b> inc. earthquakes, volcanic eruptions and landslides	<b>Extreme weather</b> inc. hurricanes, tsunamis, floods, drought and snowstorms	<b>Diseases</b> inc. influenza, cholera, tuberculosis and AIDs	<b>Pandemics</b> inc. swine flu, bird flu, SARS, and Zika	<b>Infections</b> inc. malaria, typhoid, dengue fever and hepatitis	
<b>Employee</b>	<b>Administrative</b> inc. lack of/wrong visa, immigration challenges/fines	<b>Everyday</b> inc. cancelled flights, lost luggage and forgotten/expired passport	<b>Mental health</b> inc. stress, overworking and isolation			

A small sample of the questions that should be answered within a policy framework before travel is approved or deployment commenced would include:

- Is the trip to an elevated risk/unfamiliar location really necessary?
- Do the benefits outweigh the risks?
- What would the ideal risk management solution look like?
- How much of this is feasible within budget?
- How well equipped are we to deal with an incident?
- What is the potential impact of our worst-case scenario?

From a Duty of Care perspective, key issues that need to be demonstrated and supported with evidence include:

- How was the decision made?
- Who made the decision?
  - Based on what criteria?
  - In accordance with which policy?
  - Subject to which mitigation measures?

The evidence would need to cover these elements as the bare minimum to prove reasonable steps had been taken to demonstrate Duty of Care.

Decisions over the level of travel security support to be provided to a traveller for a seemingly routine international trip potentially face major scrutiny in the event of any incident. For example, the decision to allow travellers to choose a taxi rather than providing a private driver or security escort will be questioned in the event of their falling victim to a road traffic accident or criminal scam.

Demonstrating how Duty of Care was upheld as an organisational priority will be under the spotlight. How cost considerations influenced risk management standards will certainly be in question. Cutting corners can turn out to be very expensive in the long run.

## Putting theory into practice

It is one thing for an organisation to develop a policy and implement it with a supporting combination of internal processes, insurance assistance coverage and external providers; it is

quite another thing to ensure these measures are genuinely effective.

Whether they have full, partial or peripheral responsibility for Duty of Care programmes, all concerned must have in-depth understanding of issues such as:

- What insurance and assistance cover do we have in place across the organisation? What does this entitle us to, and do we understand all the benefits?
- Who are the ultimate service providers and do our systems link with theirs to keep everyone in sync and up to date on current risks?
- What is the track record of these providers and can I trust them with our people's safety?
- Do our employees know what provision is in place and how to access it?
- Are our internal communications up to the mark on all relevant policies and coverage?

## Empowering travellers

Response-based programmes and policies focus on offering support in the event of an incident. In other words, they react to an event that has already occurred. Truly effective Duty of Care provision requires proactive engagement and a broader approach to Duty of Care and travel risk management.

Proactive measures aimed at better preparing international travellers focus on making it less likely that they will experience security and safety incidents. Improving individuals' awareness and behaviour can be an effective way to help them keep themselves safer.

Organisations are often all too happy to invest time in training employees on expense reporting and travel spend policies but leave out health and safety. Taking a proactive approach to traveller wellbeing provides clear

## Are your business travellers protected?

In our experience, we've found that there are several key questions you need to ask yourself in order to ensure the wellbeing of travellers and to fulfil your Duty of Care:

Do we have a travel risk policy in place?

Does it cater for different levels of employee seniority?

Do we have a travel risk management programme in place?

Does it focus on both international and domestic travel?

Do we educate travellers about potential risks ahead of a business trip?

Do we assess risk at every stage of the journey?

Do we keep a record of safety advice given to travellers?

Do we use learnings to improve our resilience?

Do we have crisis response plans?

Do we regularly review and test our travel risk programme?

evidence of your Duty of Care processes in action. The training and systems you put in place will show that you have invested thought and effort into pre-empting and avoiding risky situations.

## Employee location and communication tools

Tracking employees brings its own challenges. Rather as a tachograph might be regarded as a 'spy in the cab', tracking can give rise to concerns over privacy. In some European jurisdictions, union action has led to restrictions on tracking.

Yet the ability to effectively locate and communicate with personnel in the event of an incident is central to an effective response. Furthermore, such a platform can form the core axis around which a number of other tools and processes can be structured, all with the ultimate objective of ensuring the safety and security of personnel worldwide, and being able to demonstrate that reasonable measures have been taken.

In short, there is a balance to be struck: employers need to meet their Duty of Care obligations while respecting their employees' right to privacy.

## Managing expectations and understanding limitations

It is not possible to guarantee 100% that no harm will ever come to anyone within your remit. This is neither realistic nor achievable.

Duty of Care obligations do not expect this and are not based on this aspiration. There will be some situations that defy even the best laid plans through exceptional circumstances or where a single point of failure is unavoidable. Inevitably, some plans will have to be reworked in real-time.

To give some recent examples...

- Embassies may close due to unspecified threats
- Earthquakes may destroy infrastructure and disable communications
- Volcanic activity may close airspace across a whole region
- Road routes may be blocked by protesters, militants or the armed forces

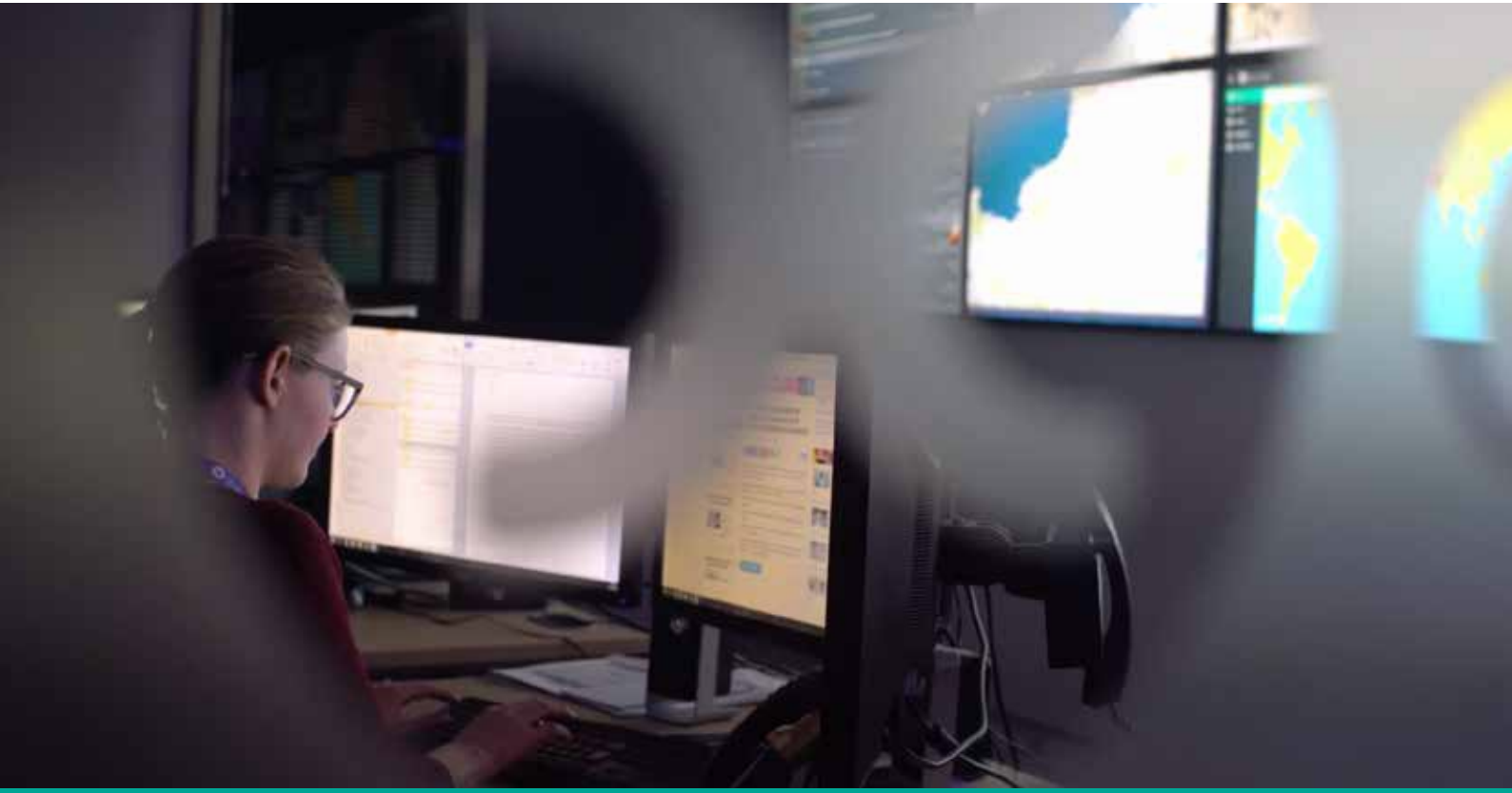
Duty of Care evaluations following such cases will focus on the reasonableness of all the measures taken and how these were adapted under extreme circumstances. Effective processes and established communication flows between all parties are particularly critical in these instances.

## Summary

It should be a priority for organisations to be able to fully demonstrate that they've taken reasonable steps to protect their personnel. This Duty of Care applies equally to the safety and security of business travellers too, expatriates and employees on 'home soil'. Although risks may be higher in certain regions, the unexpected can happen anywhere, at any time, at home or abroad.

Much more is now being made of Duty of Care in the workplace with growing awareness around regulations and legislation. Yet, business travellers expatriate employees still often fall between the cracks and are neglected, despite the potentially increased risks.

Travel risk management plans and processes should form an integral part of corporate wide Duty of Care considerations, sitting within an established framework where ownership, responsibility and lines of communication are clear. They should also be subject to specialist risk review to ensure they are proportionate to the specific threat, vulnerability and risk profile.



Section three  
**Drum Cussac**

## How we can help you to fulfil your Duty of Care

In this whitepaper, we have only been able to touch on some of the key factors that organisations must consider in understanding their Duty of Care obligations.

As a global security consultancy responsible for ensuring the safety of more than 15 million lives on a daily basis, we're perfectly placed to help ensure the safety of your most people, whether they're at home or abroad.

We invite you to explore more fully with us how to safeguard your personnel, assets, profitability and reputation and to discuss how properly managed risk can create commercial opportunity and competitive advantage.

The following Drum Cussac services can help you fulfil your duty of care to travellers:

### RiskMonitor

With access to global intelligence for around 200 countries/territories, 300 cities and 900 sub-national regions, as well as daily real-time risk alerts, RiskMonitor is the go-to tool for staying ahead of global threats.

### Roll Call

Establish real-time two-way communications with travellers during a crisis. Quickly identify who needs support and prioritise your resources accordingly - all from within the GlobalRiskManager app.

### PeopleMonitor

Track the location of your employees from a single, user-friendly dashboard with PeopleMonitor. Whether they work in the office, remotely or overseas, you can monitor their location wherever they are and ensure that they are safe.

### OverWatch

For maximum peace of mind, we can proactively oversee the security risk management of your people and assets. Think of us as your own outsourced security team, working 24/7 to support your own in-house capabilities.

Pre-travel	During travel	Post-travel
<ul style="list-style-type: none"> <li>• RiskMonitor</li> <li>• TravelPrepare eLearning courses</li> <li>• Bespoke training</li> <li>• Risk Consultancy</li> <li>• OverWatch</li> <li>• Custom Intelligence Research</li> </ul>	<ul style="list-style-type: none"> <li>• RiskMonitor</li> <li>• PeopleMonitor</li> <li>• OverWatch</li> <li>• PEND</li> <li>• GlobalSOS</li> <li>• Journey Management and Executive Protection</li> </ul>	<ul style="list-style-type: none"> <li>• RiskMonitor</li> <li>• PeopleMonitor</li> <li>• OverWatch</li> <li>• Risk Consultancy</li> </ul>

Fulfil your duty of care and keep your travellers safe with an exclusive RiskMonitor free trial. Find out more now:

e: [info@drum-cussac.com](mailto:info@drum-cussac.com) | t: +44 (0) 1202 802 060 (24hr)

## Other Drum Cussac services

Ensuring the safety of your colleagues so that business-as-usual can continue day after day is a tough job. With the company's most important assets in your hands, you need to ensure that nothing can - or does - go wrong.

Our modular approach to business risk mitigation means that you can combine our services as you see fit - sort of like LEGO. This makes it much easier for you to tailor our services to your needs and fulfil your duty of care obligations.

Our security services cover everything from in-house risk consultations to post-disaster evacuations and fully-managed end-to-end outsourced security solutions. To mitigate the threats to your business and people, we recommend combining RiskMonitor with the following:

---

## Journey management and executive protection

If travellers need additional support or protection throughout their journey, then our Journey Management team are the people you should speak to. We can organise in-country support, transport and protection to ensure your travellers stay safe and have a successful business trip.

## PEND

Our political and natural disaster evacuation service does exactly what it says on the tin. If your travellers are stuck in a high risk area and need to get them out, then look no further.

## TravelPrepare eLearning

Every single one of your travellers can benefit from our engaging and educational eLearning tools. Travellers can complete the course at their own pace and will learn practical advice that keep them safe when travelling abroad for business.

Interested in how our other services can ensure operational continuity and the safety of your teams? Get in touch now: [info@drum-cussac.com](mailto:info@drum-cussac.com)



## Case Study: Evacuations from Fiji 2016

In the worst case scenario, fulfilling your Duty of Care can extend to protecting the lives of your people. If travellers are caught in the middle of a geopolitical or natural disaster then you may need to evacuate them to safety.

When Cyclone Winston tore through the Pacific in February 2016 it left dozens of people dead and tens of thousands homeless and without water across the archipelago nation of Fiji.

Here's how we responded to the call for help and secured our client's safety in the aftermath of the worst storm ever recorded in the southern hemisphere.

### The situation

A European client from a leading British institution had been undertaking fieldwork on one of Fiji's 300 islands. Most of her clothes, equipment and research were destroyed in the cyclone and she sustained several minor injuries.

With the island's communications links and infrastructure devastated by Winston, only limited official help was getting through. She contacted us for help, having been given our Global Operations Centre emergency number by her institution before her trip.

### The response

We mobilized our global network of local, pre-vetted agents, and assigned a male consultant and a female chaperone to the case. We also monitored her location and made two-hourly welfare calls until help arrived

Our team undertook a challenging journey, travelling over land and by air to reach the remote village where the student had taken

shelter. Our consultants then escorted her across the archipelago to an airport on a neighboring island, where international flights out of the area were still in operation.

Behind the scenes, we handled all the administration to facilitate the evacuation, including hiring vehicles, booking hotels and flights, and completing all the travel paperwork on the evacuee's behalf.

We also arranged a telephone assessment of her medical condition to check she was fit for both short- and long-haul travel and did everything necessary for her comfort. She had been unable to contact her next of kin, so we kept them updated throughout her journey.

### The outcome

Within three days of our team arriving on the island where the client had been conducting her research, she had entered European airspace and was on her way home.



Drum Cussac is a global consultancy delivering intelligence-led, technology-enabled risk, security and crisis management solutions to leading international organizations. Our specialist operations teams are recognized experts in providing a highly responsive and proactive resource in challenging and demanding situations.

### **Drum Cussac Group Ltd.**

---

Avalon 26-32 Oxford Road Bournemouth BH8 8EZ	Peninsular House, 30 Monument Street, London EC3R 8NB
---	--

e: [info@drum-cussac.com](mailto:info@drum-cussac.com)  
t: +44 (0) 1202 802 060 (24hr)

You can ensure the safety of your personnel with global risk alerts by contacting Drum Cussac today. Our travel risk management solutions can help you fulfil your legal Duty of Care obligations, maximize operational resilience, and maintain business continuity.

---

#### **Disclaimer**

Drum Cussac Group Limited and any of its affiliated or associated companies, or any company in the Drum Cussac group of companies makes no representation, warranties or assurance against risk with respect to the contents or use of this document, and specifically disclaims any express or implied warranties or usefulness for any particular purpose of this publication. Recommendations made are based on information provided by the client and other information available at the time of writing. No express or implied warranty is given in respect of any judgment made or to changes or any unforeseen escalation of any factors affecting any such judgment. Drum Cussac Group Limited reserves the right to change or revise this document, in consultation with the recipient. This document has been prepared for the exclusive use and benefit of the addressee(s) and solely for the purpose for which it is provided. Unless we provide express prior written consent, no part of this report should be reproduced, distributed or communicated to any third party. We do not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report.

#### **Copyright**

Copyright 2018 Drum Cussac Group Limited and companies in the Drum Cussac group of companies. All rights reserved. No part of this publication may be reproduced, photocopied, stored on a retrieval system, or transmitted without the express prior consent of Drum Cussac Group Limited and companies in the Drum Cussac group of companies.