

STATEMENT OF BUSINESS ETHICS AND ANTI-CORRUPTION POLICY

Public Administration International (PAI) is committed to the promotion of high standards of ethical conduct in its business activities. We ensure that our staff are fully informed of the rules, regulations and compliance issues that apply to the work we undertake on behalf of national and international clients. In particular, we apply this knowledge to the conduct of our business within the framework of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1999) and the Bribery Act 2010.

All staff, Associate Consultants, Programme Directors and anyone else working on behalf of PAI are required to comply with our ethical policies and procedures. We seek to collaborate on public sector consultancy and training initiatives with organisations who share our strong commitment to ethical values and principles.

PAI will aim to ensure that all statements, communications and representations made to prospective clients in project proposals and bid preparations are accurate and truthful. Once awarded, we will ensure that contracts are implemented according to the agreed specifications, requirements and clauses. PAI will not pay bribes or try to influence improperly decisions about awards of projects, nor will PAI condone such behaviour in others. We will avoid any conflicts of interest and will inform clients beforehand of any potential conflict of interest that could arise during the implementation of contracts.

PAI will only undertake project assignments in our areas of expertise, where we can deliver efficient, effective and high quality services to our clients. We will act with loyalty to our clients, and respect the confidentiality of proprietary information that we acquire from partners and clients during the course of our normal business activities. We will also carry out due diligence on partner organisations.

Brochures and other formal documents will reflect PAI's experience and track record accurately.

We will maintain accurate and complete company records and provide full reports of project activities within the time frame agreed with our clients. All transactions between PAI and outside individuals and organisations will be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles.

We will not take part in any activities that could damage PAI's reputation or that of clients or partner organisations.

The Policy

In order to comply with the provisions of the Bribery Act 2010, PAI prohibits all staff, Associate Consultants, Programme Directors and anyone else working on behalf of PAI from:

- Offering, giving, soliciting or accepting any bribe, whether cash or other inducement, to or from any person or company, in order to gain any commercial, contractual or regulatory advantage for PAI or anyone connected to PAI in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise. Any such payment or inducement may result in immediate dismissal for those involved in their payment or receipt.

This policy does not prohibit the following practices providing they are customary in a particular market, or are proportionate and are properly recorded:

- Normal and appropriate hospitality (given or received)
- The giving of an appropriate gift at a festival, ceremony or at another special time. (Please see paragraph below for further explanation).
- The use of any recognised fast-track process which is available to all on payment of a fee

PAI recognises that market practice varies across those countries in which it does business and what is normal and acceptable in one place may not be in another. PAI also appreciates that to refuse a gift in certain circumstances and/or countries would cause offence to our clients and partners. The test to

be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable. What is the intention of the gift? Special care must be taken in accepting or giving gifts and/or entertainment, particularly from or to a public official and these are not permitted if it would create a real or perceived conflict of interest.

PAI will keep financial records and have appropriate internal controls in place which will provide evidence of the business reason for making any payments to third parties.

The prevention, detection and reporting of bribery and corruption is the responsibility of all staff, Associate Consultants, Programme Directors and anyone else working on behalf of PAI. Any suspicion of bribery can be reported confidentially to one of the Directors of PAI. If anyone is in doubt as to whether a potential act constitutes bribery/corruption, the matter should be referred to one of PAI's Directors.

Training will be given to all members of staff on how to recognise and avoid bribery. Please see PAI's "Whistleblowing" policy for procedures for reporting corruption in a safe and confidential way.

The Directors are responsible for carrying out regular risk assessments and for implementing and monitoring this policy which will be reviewed annually.

Claire Cameron
Director

Donald McGregor
Director

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