

BUSINESS ETHICS AND ANTI-CORRUPTION POLICY

Definitions

1. In this policy document:

“bribe” means an improper inducement in money or by other means to gain commercial, contractual or regulatory advantage;

“corruption” means abuse of a power, trust or position for improper gain, and includes use of a bribe or extortion, acting in a situation where there is a conflict of interest, and practising nepotism.

Statement of business ethics and anti-corruption measures

2. PAI is committed to high standards of ethical conduct in its business activities, ensures that our Directors, staff, Associate Consultants, Workshop Directors or other persons acting on behalf of PAI are fully informed of the rules, regulations or compliance issues that apply to work undertaken on behalf of our clients, and conducts 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 of the UK.

3. PAI Directors, staff, Associate Consultants, Workshop Directors or other persons acting on our behalf are required to behave honestly and to comply with our ethical policies and procedures. Such a person is forbidden specifically from offering, giving, soliciting or accepting a bribe in order to secure an advantage for PAI or a person connected with PAI, or in order to secure a personal advantage while undertaking work for PAI.

4. PAI will not take part in an activity that could damage its ethical reputation or that of a client or partner organisation.

Relationship with clients, potential clients and partners

5. PAI will do its best to ensure that any statement or representation to a potential client in a project proposal or bid presentation is accurate and truthful. Our brochures and other formal documents will accurately reflect our experience and achievements.

6. PAI will not pay a bribe or try to influence improperly a decision about an award of a project, neither will we seek to induce or encourage a client or partner organisation to undertake an improper activity on our behalf.

7. When considering associate consultants for work on DFID funded business, we will consider any conflict of interest issues. Where a conflict of interest might exist or if the associate consultant has been employed by DFID or any other UK Government Ministry in the preceding two years, then we will declare this to DFID. Conflict of interest issues include situations where the potential associate consultant has:

- Been involved in drafting terms of reference or preparing other tender documents for a project for which we are bidding

- As part of his/her UK Civil Service employment during the last two years, had access to privileged information or commercially sensitive information, including information on competitors, which could benefit PAI
- Been employed as a public servant in the country where we are bidding for work, if he/she is being considered for inclusion as a proposed team member in our bid

8. Before including consultants in consultancy proposals and/or engaging them on contracts, we will carry out reference checks to verify the quality of their work, their suitability for the assignment under consideration, their integrity and any other relevant issues.

9. PAI will ensure that a contract awarded to us is implemented according to agreed specifications and requirements and in particular, during the implementation of a contract, we will:

- (a) do our best to avoid a situation where conflict of interest is likely to arise;
- (b) inform clients beforehand of any potential conflict of interest that might arise;
- (c) require a person acting on our behalf to do his or her best to prevent, or identify and rectify, any corruption or impropriety.

10. PAI will undertake contracts only within our areas of expertise and where efficient, effective and high-quality services can be delivered to clients. We will act with loyalty towards clients and will respect the confidentiality of proprietary information acquired from a partner or a client during business activities.

11. PAI will undertake, and provide a full report on, any project activity within the timeframe agreed with clients.

12. PAI will expect any consortium partner or sub-contractor to share our values and ethical standards and will make all reasonable enquiries as to the ability of either to do so. We will terminate a contractual arrangement with a person acting on behalf of PAI if we find evidence of that person having been involved in corruption.

Financial management and audit

13. PAI will keep accurate financial records and have appropriate internal controls in place to provide evidence of the business reason for making a payment to a third party. A transaction between PAI and a third party will be promptly and accurately entered into our records in accordance with generally accepted accounting practices. We will co-operate with and assist clients in performing any audit, review, investigation or financial study requested. We will ensure that we pay our taxes on time.

Gifts and hospitality

14. PAI recognises that market practices vary in countries in which we do business and that to refuse a gift in certain circumstances might sometimes cause upset or even offence. In such cases we will apply the test of whether a gift or offer of hospitality is reasonable and justifiable in the circumstances. In particular we will take special care to see that a gift or offer of hospitality would not be likely to create a real or perceived conflict of interest, and would not in any circumstances sanction the giving or receiving of a gift of money.

15. PAI would regard the following as appropriate but would require that each is appropriately recorded:

- the giving or receiving of normal and proportionate hospitality
- the giving or receiving of an appropriate gift at a festival, ceremony or other special occasion
- the use of any recognised fast-track process which is available to all on payment of a fee

Preventing, investigating and reporting corruption

16. A PAI Director, staff member, Associate Consultant, Workshop Director or other person acting on our behalf who encounters or suspects corruption in relation to PAI's business dealings must report the fact to one of PAI's Directors (see PAI's "Whistle-Blowing and Safeguarding" policy procedures for reporting corruption in a safe and confidential way).

17. In the event of a report under paragraph 14, PAI's Directors will:

- initiate an investigation within 24 hours
- gather evidence if corruption appears to them to have taken place
- decide whether any relevant PAI client, the relevant donor agency, auditors, the police or any anti-corruption agency should be informed and will keep a record of any such investigation and any resulting action taken.

Communication, training and guidance

18. PAI will issue this policy document to all persons working on behalf of PAI and to consultancy consortium partners, and will publish it on our website.

19. Where appropriate, PAI will give advice and training to PAI Directors, staff members, Associate Consultants, Workshop Directors or other person acting on our behalf on ethical behaviour and how to avoid corruption, in particular bribery and conflict of interest, and requires all persons acting on our behalf to seek guidance from our Directors if they consider there is a risk of their encountering corruption. Free anti-bribery training is offered by Transparency International via an e-learning module available at www.transparency.org.uk/training

Review

20. PAI Directors will carry out regular risk assessments relating to corruption, will review this policy annually and will inform members of staff, Associate Consultants, Workshop Directors and other persons acting on our behalf about any changes to it.



Claire Cameron
Director



Slava Gromlyuk
Director for Business Development