



Policy:	Ethical Code for Business Partners (Organisations)
Author:	Head of Business Integrity
Approver:	Chief Compliance Officer
Version:	2.1
Effective date:	March 2013
Reviewed:	November 2021
Review due:	November 2022

Table of Revisions

Version	Date	Description	Author	Approver
2.0	08/2021	Updating information about new whistleblowing provider	Zinnia Shah	Dan Bord
2.1	11/2021	<ul style="list-style-type: none">• 7. added "including consultants" to bullet 3.2• 11. Added bullet "Understand and implement relevant legislation, such as, but not limited to the UK Modern Slavery Act, 2015 and the US Combating Trafficking Regulation".	Zinnia Shah	Ian Malcomson

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1 Purpose of the Ethical Code for Business Partners /

- Courage and Authenticity are Crown Agents' foundation values. The Ethical Code for Business Partners (Companies) sets out standards which underpin these values. This Code is essential reading for all Crown Agents' suppliers, implementing partners, joint venture partners or any other associate or legal entity who agrees to adopt it.
- Crown Agents expects all Business Partners to understand and uphold the standards of the Code. Failure by Business Partners to adhere to the Code may entitle Crown Agents to terminate their contracts with Crown Agents for cause.
- The Code represents the minimum ethical standard Crown Agents expects its business partners to abide by. Adherence to additional standards may be required dependant on donor/client expectations, project context and/or specific legal or regulatory compliance.

2 Business Integrity: A Crown Agents' Business Partner Will /

- Keep to their word and respect and honour all contractual commitments;
- Be impartial when selecting contractors and suppliers and make choices on the basis of merit alone;
- Support the principles of free and ethical trade at both the national and international level and comply with all anti-trust laws and good procurement and tendering practices;
- Ensure that the interests of clients, donors and business partners they deal with for Crown Agents are not prejudiced by any collusive, fraudulent or anti-competitive behaviour;
- Comply with all client and donor rules and guidelines applicable to any bid or proposal exercise on which they work with Crown Agents. Thereafter, if the bid or proposal is successful, comply to the terms of the contract with the client or the subject of such bid or proposal;
- Ensure any potential issues including but not limited to conflicts of interests or business relationships that could affect the project or proposal are disclosed and discussed as early as possible.
- Avoid working on projects or contracts where there are concerns regarding the underlying purpose or objective of the project or contract or regarding the ethical stance and/or reputation of a client or funder or any other prospective business partner.
- Ensure 30-day [prompt payment](#) terms are passed down the supply chain as stated in the Public Contracts Regulations (2015), which Crown Agents also adheres to.

3 Legal Obligations: A Crown Agents Business Partner Will /

- Respect and uphold the laws of all the countries in which they operate, even where those laws are not consistently enforced by local law agencies;
- Pay all necessary taxes in the countries they operate and will not engage in tax evasion or collude in it for others' benefit;
- Cooperate with Crown Agents to meet its UK legal obligations with regard to due

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diligence and investigating and reporting suspected wrongdoing;

- Comply with all political and economic sanctions imposed by the UK Government, EU, USA, UN or any other relevant State or multilateral institution.

4 Political Exposure: A Crown Agents Business Partner Will /

- Never authorise payments of any kind to political figures, government officials, political party or associated organisations on behalf of Crown Agents, or which could be interpreted as from Crown Agents, to influence a business or financial advantage or compromise Crown Agents' political neutrality;
- Never endorse or show affiliation to any political figure, government official, political party or associated organisation on behalf of Crown Agents, or which could be interpreted as from Crown Agents, to influence a business or financial advantage or compromise Crown Agents' political neutrality.

5 Anti-Bribery and Corruption: A Crown Agents' Business Partner Will /

- Respect and uphold all anti-bribery laws applicable in the countries they operate and where these laws are applicable in terms of extra-territorial reach (e.g. UK Bribery Act);
- Not offer, pay, solicit, receive, authorise, collude in or condone the payment or receipt of bribes including facilitation payments (defined as a small bribe made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement);
- Prohibit facilitation payments of all kinds regardless of how they are characterised;
- Understand it is not excusable to defend payment of a bribe or facilitation payment by arguing that it was essential to get the business done or usual according to the customs of the relevant jurisdiction;
- Understand that even the suggestion corruption may damage the reputation of Crown Agents or its business partners and affect their ability to do business and damage the reputation of their employees.

6 Money Laundering: A Crown Agents' Business Partner Will /

- Maintain a zero-tolerance policy toward all forms of money laundering and prohibit its associates from engaging in it;
- Have effective systems in place to satisfy themselves as to the identities of the beneficial owner(s) or sources of all funds they receive or handle and to prevent themselves being exploited by criminals or funding criminal activities.

7 Gifts and Hospitality: A Crown Agents' Business Partner Will /

- Not authorise or permit its employees to offer or give gifts or hospitality with the expectation that a business, financial or other advantage will be received or to reward such an advantage already given;
- Not permit its employees to solicit or receive gifts and hospitality in exchange for any business, financial or other advantage to Crown Agents or the individual employee

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concerned;

- Pay particular attention to the risks of giving and receiving gifts and hospitality to and from public and government officials, paying full attention to:
 - local laws impacting the giving of gifts and hospitality to public or government officials;
 - the pendency of any bids or negotiations with the organisation employing or for whom the public or government official (including consultants) concerned acts and the ability or perceived ability of the official concerned to influence such bids or negotiations;

and shall ensure that any gifts and hospitality given to any public or government official are not lavish, extravagant or unreasonably costly in the context of the public or government official concerned;

- Operate appropriate policies and procedures for controlling and recording gifts and hospitality by their personnel or anyone acting on their behalf.

8 Conflicts of Interest: A Crown Agents' Business Partner Will /

- Together with their employees and contractors manage their personal, professional and business affairs so as to avoid all actual or potential conflicts of interest between themselves and their obligations to Crown Agents, clients, donors or any other associated counterparty;
- Operate appropriate policies and procedures to identify and avoid all potential or actual conflicts of interest by their personnel or anyone acting on their behalf.

9 Safeguarding*: A Crown Agents' Business Partner Will /

- Create secure environments in which their business can operate;
- Safeguard against all forms of exploitation (especially sexual exploitation of any kind), bullying or harassment in their operations;
- Challenge such negative behaviours whenever or wherever in the world they are observed;
- Undertake robust due diligence to vet the individuals who work with/for them and on their projects;
- Maintain and operate policies and/or procedures to protect vulnerable adults and children from abuse;
- Maintain detailed and sincere records and reporting of all safeguarding-related issues.

** Regarded by Crown Agents to be a 'responsibility to take all possible steps to prevent harm potential, actual or attempted abuse of power, authority, trust or vulnerability, especially in relation to sexual exploitation and abuse. Issues related to safeguarding can also mean bullying, harassment, victimisation, discrimination personal attacks, physical or verbal abuse'*

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10 Human Rights: A Crown Agents' Business Partner Will /

- Uphold principles of basic human rights in all their business operations;
- Support and respect the protection of internationally proclaimed human rights;
- Not supply goods or services if there is reason to believe they will be used for internal repression or external aggression in violation of UK law or international law, treaties or conventions;
- Respect the culture and traditions of the communities they work within and serve.

11 Labour Rights: A Crown Agents' Business Partner Will /

- Take strong measures to mitigate modern slavery and child labour risk in their operations;
- Commit to an employment policy of non-discrimination and equal opportunity;
- Treat everyone the same and offer equal opportunity to all regardless of age, race, religion, national or ethnic origin, gender identity, sexual orientation, political affiliation or disability.
- Understand and implement relevant legislation, such as, but not limited to the UK Modern Slavery Act, 2015 and the US Combating Trafficking Regulation.

12 Sustainability and the Environment: A Crown Agents' Business Partner Will /

- Operate in an environmentally responsible manner and endeavour to source goods and services from suppliers who similarly respect the environment;
- Where possible work with product designers and suppliers to improve environmental performance and extend responsibility throughout supply and value chains;
- Recognise initiatives that promote greater environmental responsibility, including increased self-regulation, guided by appropriate codes and charters integrated into all elements of business planning and decision-making, and fostering openness and dialogue with employees and the public in regard to environmental risks;
- Consider the social, political and economic impact of their actions on the communities they operate within when deciding to associate with a project and/or when taking on a contract.

13 Speak-Up Culture: A Crown Agents' Business Partner Will /

- Encourage open dialogue on any subject or issue within their operations;
- Operate management structures enabling stakeholders to articulate concerns without fear of retaliation;
- Make whistle-blowing mechanisms freely available and accessible to all their stakeholders;
- Treat all complaints and concerns received with the utmost seriousness and in full confidence;

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- Ensure that, when contractually or morally required, a whistle-blowing incident is reported to Crown Agents or any other relevant partner, donor or regulatory authority in a timely, informative and truthful manner.

14 Data Accountability and Record Keeping: A Crown Agents Business Partner Will /

- Maintain systematic records of all activities related to any bid, proposal or project of which Crown Agents is a part;
- Ensure the records and data kept are securely stored and manage;
- Retain such records for stated retention periods in line with any Crown Agents' requirement, client requirement, applicable law or regulatory authority;
- Grant access to records for audit purposes if and when necessary;
- Protect personal and/or sensitive data as a matter of priority;
- Recognise individual's right to access information and personal data under applicable law.

Reporting Concerns

Business Partners are encouraged to raise concerns about any instances of suspected malpractice or violations of this policy at the earliest possible stage through their Line Manager, Crown Agents' confidential reporting hotline hosted by SeeHearSpeakUp or by contacting the Crown Agents' Business Integrity Unit directly.

- Telephone calls to SeeHearSpeakUp are free and its lines are open 24 hours a day, 7 days a week. Arrangements can be made for calls to be conducted in a wide range of languages. Calls to SeeHearSpeakUp can be made anonymously, if preferred. Guidance on using SeeHearSpeakUp and the relevant telephone numbers and e-mail address can be found on our website: <https://www.crownagents.com/who-we-are/business-integrity/speak-upculture/>
- All concerns will be addressed in a robust manner. Crown Agents always responds to any concern raised.
- Crown Agents will deal with any malicious allegation in an appropriate manner.

US Reporting

If there is suspected human trafficking or concerns thereof in any US funded project, these concerns should be reported to the following hotline.

Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org