

PAVOCAT GROUP

Experts in **Counter-Corruption** and **International Humanitarian Law**

OUR BUSINESS PRINCIPLES

Updated Sept 2021



GENERAL BUSINESS PRINCIPLES

The Pavocat General Business Principles govern how each of the Pavocat companies which make up the Pavocat Group* conducts its affairs.

*PAVOCAT GROUP

Pavocat Group Ltd and the companies in which it directly or indirectly owns investments are separate and distinct entities. But in this publication, the collective expressions ‘Pavocat’ and ‘Pavocat Group’ may be used for convenience where reference is made in general to those companies. Likewise, the words ‘we’, ‘us’, ‘our’ and ‘ourselves’ are used in some places to refer to the companies of the Pavocat Group in general. These expressions are also used where no useful purpose is served by identifying any particular company or companies.

STATEMENT

Pavocat’s purpose is to counter corruption in all its forms and to promote and enhance compliance with the Laws of Conflict. Our experience ensures that we are able to provide our clients with solutions to any problem or situation relating to corruption or the Laws of Conflict. We believe that by raising standards and improving compliance we can reduce risk and harm, At the same time this can also create significant and lasting benefits, be they social, financial and/or ethical.

Our shared core values of integrity, transparency and excellence lie at the heart of all the work we do and are the foundation of our Business Principles.

The Business Principles apply to all commercial transactions and personal engagements, no matter the size, and drive the behaviour expected of every employee in every Pavocat company in the conduct of its business.

We are judged by what we do and how we behave. Our reputation will be upheld if we act in accordance with the law and the Business Principles. We actively encourage our business partners to follow them or to adopt equivalent principles.

As managers, we recognise it is our responsibility to set the example, to ensure that people working for Pavocat are aware of these principles, and to behave in accordance with the spirit as well as with the letter of this statement.

As part of the assurance system, it is also the responsibility of management to provide employees with safe and confidential channels to raise concerns and report instances of non-compliance. In turn, it is the responsibility of Pavocat employees to report suspected breaches of the Business Principles to Pavocat.

The Business Principles are fundamental to how we conduct our business and living by them is crucial to our continued success.



James Johnstone Lee Marler James Stuart

Co-Founders and Directors

VALUES

INTEGRITY - TRANSPARENCY - RESPECT FOR OTHERS

Pavocat employees share three core values: integrity, transparency and respect for people. In addition, we regard honesty, trust, teamwork and professionalism as essential elements of our work and business.

We also strongly encourage all who work with us to take pride in what they do, because we believe that countering corruption and improving compliance with International Humanitarian Law can only be for the greater good.

RESPONSIBILITIES

We recognise four areas of responsibility. It is the duty of management continuously to assess the priorities and discharge these inseparable responsibilities on the basis of that assessment.

Clients: To win and maintain customers by developing and providing products and services which offer value in terms of price, quality, safety and environmental impact, which are supported by the requisite technological, environmental and commercial expertise.

Employees: To promote the development and best use of the talents of our employees; to create an inclusive work environment where every employee has an equal opportunity to develop his or her skills and talents. To encourage the involvement of employees in the planning and direction of their work; to provide them with channels to report concerns. We recognise that commercial success depends on the full commitment of all employees.

Contractors: To seek mutually beneficial relationships with contractors, suppliers and in joint ventures and to promote the application of these Pavocat General Business Principles or equivalent principles in such relationships. The ability to promote these principles effectively will be an important factor in the decision to enter into or remain in such relationships.

Society: To conduct business as responsible corporate members of society, to comply with applicable laws and regulations, to support fundamental human rights in line with the legitimate role of business, and to give proper regard to health, safety, security and the environment.

ESG

ENVIRONMENT - SOCIAL - GOVERNANCE

Our ESG Policy is set in detail on our website at www.pavocat.com/environment-social-governance/

BUSINESS PRINCIPLES

Economic

Long-term profitability is essential to achieving our business goals and to our continued growth. It is a measure both of efficiency and of the value that clients place on Pavocat services. It supplies the necessary corporate resources for the continuing investment that is required to develop and deliver services and professional training to meet client needs. Without profits and a strong financial foundation, it would not be possible to fulfil our responsibilities.

Political Activity

We act in a socially responsible manner within the laws of the countries in which we operate in pursuit of our legitimate commercial objectives.

We do not make payments to political parties, organisations or their representatives. We do not take part in party politics. However, when dealing with governments, we have the right and the responsibility to make our position known on any matters, which affect us, our employees, our customers, our shareholders or local communities in a manner, which is in accordance with our values and the Business Principles.

Communication

We seek to listen and respond honestly and responsibly in our interactions with employees, business partners and local communities.

Integrity

We insist on honesty, integrity and fairness in all aspects of our business and expect the same in our relationships with all those with whom we do business. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form is unacceptable. Facilitation payments are also bribes and must not be made. Employees must avoid conflicts of interest between their private activities and their part in the conduct of company business. Employees must also declare to their employing company potential conflicts of interest.

All business transactions on behalf of a Pavocat company must be reflected accurately and fairly in the accounts of the company in accordance with established procedures and are subject to audit and disclosure.

Competition

We support free enterprise. We seek to compete fairly and ethically and within the framework of applicable competition laws; we will not prevent others from competing freely with us.

Compliance

We comply with all applicable international laws and the laws and regulations of the countries in which we operate.



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