



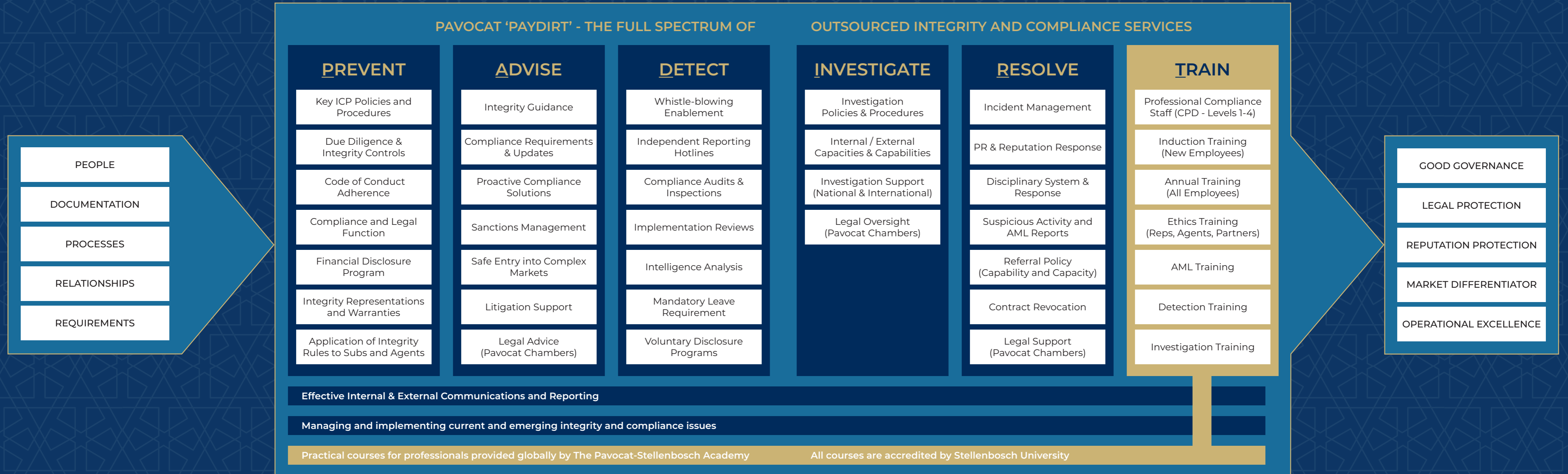
Experts in
COUNTER-CORRUPTION

THE PAVOCAT 'PAYDIRT' SYSTEM

Providing the full spectrum of outsourced

INTEGRITY & COMPLIANCE SERVICES

Ensuring companies and organisations can do business safely and securely
with Clients, Partners, Agents and Suppliers around the globe



WHAT 'PAYDIRT' DOES

SUPPORTS

Pavocat's 'PAYDIRT' system provides the full spectrum of integrity and compliance services to companies and organisations which either require specialist support or do not have the necessary capacity or capability to manage these complex issues themselves.

We help boards of directors and executive management to put in place all the systems and processes needed to ensure they fully address existing and emerging compliance requirements, which can often evolve rapidly and unexpectedly (as seen, for example, in the swift imposition of the new international sanctions regime following Russia's invasion of Ukraine).

We also provide bespoke advice and support for organisations wishing to do business safely in complex integrity environments.

Our work covers an organisation's internal integrity and compliance issues as well as all the external integrity risks – including those posed by subcontractors, agents, representatives, supply chains, contracts and financing – that an organisation is obliged to take into account.

PROTECTS

With compliance now an essential element of doing business, organisations that have a robust integrity and compliance program in place are protected from the serious legal, financial, and operational risks of non-compliance, as well as the reputational risk. Your organisation's reputation is its most valuable asset, and that value can be easily quantified: it is your market capitalisation.

PROMOTES

Effective communication and demonstration of an organisation's commitment to a culture of integrity enhances trust, builds brand and reputational value, and is a significant commercial differentiator. Compliance should therefore be seen not as an expense but rather as the invaluable tool that helps an organisation to secure and promote (1) its business activities, and (2) its reputation with stakeholders and investors.

ENABLES

Effective compliance should not be regarded as a brake on business activity when in fact it is the only way an organisation can address integrity risks so as to enable business to take place. Pavocat's international team of compliance experts specialise in taking a proactive role in compliance risk management to ensure that organisations can legally and safely enter complex integrity environments to develop new business, markets and commercial relationships.

“In looking for people to hire, you look for three qualities: integrity, intelligence, and energy.

And, if they don't have the first, the other two will kill you.”

WARREN BUFFET - CEO OF BERKSHIRE HATHAWAY

THE BENEFITS OF THE 'PAYDIRT' SYSTEM

MINIMISE RISK

We help companies and organisations to avoid financially and reputationally damaging events (such as regulatory actions, criminal investigations and litigation). We proactively integrate and align each client's compliance culture to take into account all the risks relevant to their business activities. These risks, which are robustly policed by regulators and law enforcement agencies, must always be taken into consideration and include:

- Foreign trade and sanctions
- Bribery and corruption
- Money-laundering
- Fraud
- Data privacy and data protection

MAXIMISE REWARD

We ensure that our companies and organisations embed effective integrity compliance management into their business operations.

This gives our clients significant commercial benefits because they can:

- Address risks proactively rather than reactively
- Prevent and detect improper behaviour
- Investigate and resolve alleged misconduct
- Measure the financial, legal and reputational implications when issues arise
- Drive better business performance
- Satisfy stakeholder scrutiny and expectations regarding integrity and compliance
- Safely enter complex integrity environments to develop new business
- Promote their integrity culture as a commercial differentiator

“It takes 20 years to build a reputation and five minutes to ruin it.

If you think about that, you'll do things differently.”

WARREN BUFFET - CEO OF BERKSHIRE HATHAWAY

PAVOCAT 'PAYDIRT' SYSTEM SERVICES

PREVENTION

FUNCTIONS & PROGRAMS

- Compliance Function
- Legal Function – In-house Counsel and Leadership Team Responsibilities
- Counter-corruption Focused Internal Financial Controls and Record-Keeping
- Financial and Ethical Transparency
- Integrity Due Diligence (e.g., New Employees, Commercial Partners, etc.)
- Auditing and Counter-Corruption Lessons Learned
- Application of Rules to Affiliates, Joint Venture Partners, Suppliers, Agents, etc.
- Reporting Counter-Corruption Efforts Externally via Annual Reports
- Dedicated Counter-Corruption Section of Company Website
- Relationship with Counter-Corruption Entities (e.g., Transparency International)

KEY DOCUMENTATION

- Statement of Values
- Code of Conduct
- Counter-Corruption Policy
- Anti-Money Laundering Policy
- Agents and Representatives Policy
- Financial Disclosure Program
- Employee Annual Compliance Pledge and Certification
- Integrity Pledges – Agents, Representatives and Partners
- Contractual Terms, Conditions & Warranties (e.g., AML, bribery, sanctions, etc.)
- Policy of Referring Fraud and Corruption to Law Enforcement
- Employee Disciplinary Procedures and System

APPOINTMENTS & RESPONSIBILITIES

- Chief Compliance Officer
- Money-Laundering Reporting Officer (MLRO)
- External Counter-Corruption Oversight Panel

ADVICE

- Litigation Support
- Compliance Requirements and Updates
- Sanctions Management
- Proactive Solutions to Integrity and Compliance Risks
- Board and Executive Management Support
- Legal Advice (provided by barristers at Pavocat Chambers)

DETECTION

- Whistleblowing Policy (Duty to Report, Duty to Protect)
- Independent Fraud and Corruption Reporting (Hot-Line and Website Portal)
- Compliance Audits, Office Audits and Inspections
- Project Audits and Inspections
- Supervision Missions and Detailed Implementation Reviews
- Due Diligence
- Mandatory Leave Requirement (of 2 weeks or more) for Employees
- Voluntary Disclosure Program
- Intelligence Analysis

*“The cost of non-compliance is great.
If you think compliance is expensive, try non-compliance.”*

PAUL MCNULTY - FORMER US DEPUTY ATTORNEY GENERAL

PAVOCAT 'PAYDIRT' SYSTEM SERVICES

INVESTIGATION

- Investigation Policy and Procedures
- Investigative Capacity and Capability - In-house and External
- National and International Support (Pavocat Investigation Team)
- Legal Oversight from Pavocat Chambers

RESOLUTION

- Remediation Policy (Fight, Flight or Reconcile)
- Functioning Disciplinary System for Employees
- Referral Policy, Capability and Capacity
- Dismissal of Employees, Agents and Representatives
- Revocation of Contracts (e.g., Affiliates and Joint Venture partners)
- Suspicious Activity and AML Reporting
- Access to Specialist Counsel (Counter-Corruption and Employment)
- Access to PR Experts and Reputation Specialists

“Integrity, transparency and the fight against corruption have to be part of the culture. They have to be taught as fundamental values.”

ANGEL GURRÍA, OECD SECRETARY GENERAL

TRAINING

- Professional Compliance Staff (CPD) – Levels 1-4
- Ethics Induction Training to all new Employees
- Annual Mandatory Ethics Training of Employees
- Ethics Training of Agents, Representatives and Partners
- Anti-Money Laundering (AML) Training
- Investigations Training

UNIVERSITY-ACCREDITED TRAINING COURSES

Pavocat's practical training courses for professionals are provided globally by experienced instructors from The Pavocat-Stellenbosch Academy and all courses are accredited by Stellenbosch University, which is recognised internationally as an academic institution of excellence.

Stellenbosch University is rated as one of the top 300 universities in the world in the Times Higher Education World University Rankings 2022.



Stellenbosch

UNIVERSITY
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UNIVERSITEIT

forward together
sonke siya phambili
saam vorentoe

PAVOCAT'S SENIOR DELIVERY TEAM INCLUDES

Subject Matter Experts | Distinguished Lawyers | Leading Academics | Experienced Instructors
World Class Specialists | Published Authors



Sir Hugh Orde, OBE, QPM
Former Chief Constable
(Police Service Northern Ireland)
Expert in Policing
Expert in Peace Processes
Expert in Crisis Management



Jonathan Shapiro
US Attorney
Expert in Counter-Corruption



Prof Lee Marler
(Founder & Director)
Extraordinary Professor of
Public Law (SU)
Leading Counsel
Expert in Compliance
Expert in Rule of Law



Prof Geo Quinot
Professor of Public Law (SU)
Board Member
(Pavocat-Stellenbosch Academy)
Founder - African Procurement
Law Unit



Mike Kramer
Former Special Attorney
Global Expert on Combatting
Corruption & Fraud
Director of Training at the
International Anti-Corruption
Resource Centre (IACRC)



Stuart Osborne
Pavocat Investigation Team SIO
Former Chief Police Officer
Former Deputy Asst Commissioner
(Metropolitan Police)



Prof S Williams-Elegbe
Head of the Mercantile Law Dept
(Stellenbosch University)
Specialist in Anti-Corruption Law
Expert - Public Procurement Law



James Stuart
(Founder & Director)
Expert in Political & Security Issues
Expert in Threat Finance
Expert in Terrorism Finance



Justin Doherty
Expert in Awareness Campaigns
Advisor to Governments and
Companies
Expert in Communications
Expert in Reputation Capability



Jazz Omari
English Barrister
Counter-Corruption Counsel
Experienced Trainer



Mark Tomassi
English Barrister
Counter-Corruption Counsel
Experienced Trainer



Kathleen M Hamann
US Attorney
Expert in Transnational Corruption
Expert in Compliance
Former Deputy Director
(Anti-Corruption & Compliance)
US Department of State



James Johnstone
(Founder & Director)
Group Chief Operating Officer
English Barrister
Counter-Corruption Counsel



Rajah Zulfiqar
Advocate (Pakistan)
Expert in Compliance Monitoring
Compliance Lecturer and Trainer



Lievin Tshikali
Expert in Compliance
Compliance Lecturer
Chief Risk Officer

DISTINGUISHED MEMBERS

Pavocat's Strategic Advisory Panel
members include:



General The Lord Richards
Former UK Chief of Defence Staff
Chief of General Staff, British Army
Senior Advisor to the International
Institute for Strategic Studies



Wayne T Nardoliilo
Foremost Professional Expert in
Internal Corporate Investigations
Manager (Internal Investigations)
at the World Bank Group
Former Federal Criminal
Investigator (US Dept of Defence)



Prof Thuli Madonsela
Professor of Law (SU)
Formerly South Africa's Public
Protector
TIME100's 'Most Influential
People in the World'



Akere T Muna
Counter-Corruption Expert
Former Vice President of
Transparency International
Chair of the International
Anti-Corruption Conference



Piers Tuggey
Leading Insurance Expert
Expert in Complex Risk Transfer
Specialist in Cyber Risk
Specialist in Terrorism Risk



Dr Edward Hoseah
Advocate
Former D-G of the PCCB
Counter-Corruption Expert
Former VP of the International
Assoc of Anti-Corruption Authorities

OUR FORMER POSITIONS AND EXPERIENCE INCLUDE

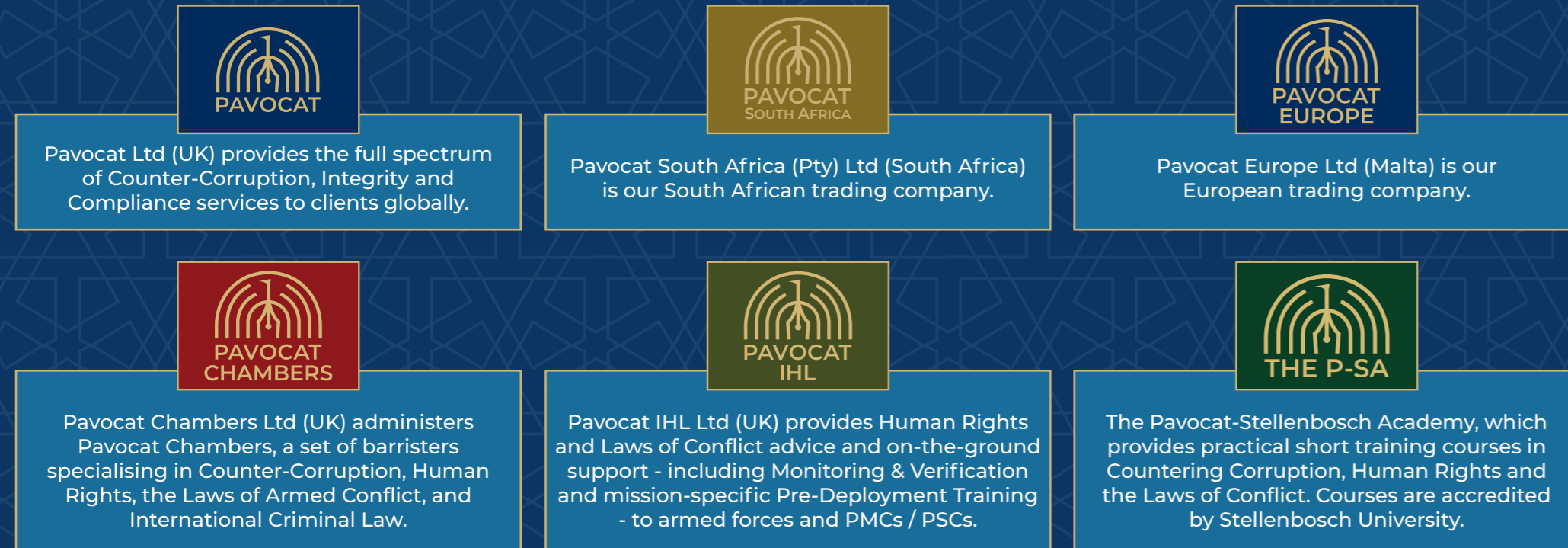
- **Director of Operations**
(World Bank Group's Integrity Vice Presidency in Washington DC)
- **Chief of Operations**
(Investigative & Forensic Audits at the World Bank Group)
- **Director of Training**
(International Anti-Corruption Resource Centre)
- **Chief Constable**
(The Police Service of Northern Ireland)
- **Deputy Assistant Commissioner**
(The Metropolitan Police Service)
- **Head of the Intelligence Unit (Anti-Corruption Command)**
(The Metropolitan Police Service)
- **Senior National Coordinator**
(UK Counter Terrorism)
- **Leader of the Covert/Overt Operations Units**
(The Metropolitan Police Service)
- **Special Counsel (Counter-Corruption)**
(EBRD)
- **Special Attorney (Organised Crime and Racketeering Section)**
to the US Dept of Justice
- **Deputy Director (Anti-Corruption and Compliance)**
(US Department of State)
- **Head of Specialist Investigations**
(UK National Terrorist Financial Investigation Unit)
- **Standing Counsel to the African Development Bank**
(Office of Integrity and Anti-Corruption)
- **Head**
(UK Threat Network Disruption Team)
- **Vice-Chair of the Board**
(Transparency International)
- **President**
(Association of Chief Police Officers)
- **Senior Planner**
(UK Counter-Fraud and Cyber-Crime Program)
- **Head**
(UK Full-Spectrum Complex Global Threats Team)
- **Joint Chief of Staff and Special Advisor**
(UK Prime Minister)
- **Special Assistant Counsel**
(President of the United States)
- **Senior Counsel and Branch Chief**
(SEC Division of Enforcement)
- **Deputy Special Prosecutor**
(Enquiry into Political Corruption by the Turks and Caicos Govern-
ment)
- **Investigation Team Leader**
(World Bank Group's Integrity Vice-Presidency)
- **Senior Investigating Officer**
(Enquiry into Political Corruption by the Bermudan Government)
- **Chief of International Law**
(United Nations in the Palestinian Occupied territories.)
- **Vice-Chair (Anti-Corruption & Money Laundering Committees)**
(The American Bar Association)
- **Senior Special Adviser**
(Independent Investigation into the UN's Oil for Food Program)
- **Chair**
(African Union Board on Corruption)
- **Assistant Inspector-General**
(Investigations Team for the US Stock Exchange Commission)
- **Chair**
(Council of the International Anti-Corruption Conference)
- **Sanctions Commissioner**
(African Development Bank)

ABOUT THE PAVOCAT GROUP

Pavocat was established in 2019 by bringing together the world's leading experts in Counter-Corruption and the Laws of War. Our acknowledged expertise and experience in these fields, combined with our comprehensive and integrated range of services, ensure that we can handle any integrity and compliance issues that our clients may have.

Our short and highly practical training courses are designed primarily for compliance officers and integrity professionals, law enforcement personnel, prosecutors, and judges. Courses are provided by leading instructors from The Pavocat-Stellenbosch Academy and can be delivered anywhere in the world. All courses are accredited by Stellenbosch University.

Headquartered in central London, and with wholly-owned subsidiaries in South Africa and Malta, we provide our full spectrum of services and university-accredited training globally to States, organisations and corporations.



PAVOCAT
what we do



We undertake complex projects globally



We provide practical training* to professionals

Organisations
Boards and Executive Management
Compliance Officers
Employees
Agents, Representatives and Subcontractors

Government
Ministers
Regulatory Authorities
Public Officials

Judiciary
Judges and Prosecutors

Law Enforcement
Specialist Fraud Units
Counter-Corruption Units
Police Officers and Investigators

Financial Sector and Professional Services
Regulatory oversight bodies
Company officers and employees
Compliance officers

* Our practical university-accredited training courses are provided globally by world-class instructors from The Pavocat-Stellenbosch Academy. All courses are accredited by Stellenbosch University.



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