

## **HTSPE Code of Ethics**

### **Introduction**

Our Mission Statement is “To mobilise and co-ordinate the skills, systems and services to help our clients achieve real benefits for themselves and the community.” Our sphere of activity is development, in other words our focus is to help improve the living conditions and standards of the less developed countries.

To be credible in this aim, we must conduct our business affairs in an open and transparent manner. The company, its staff, associates and partners shall neither give nor accept any form of bribe whether directly or indirectly to obtain or retain business. Similarly, we will not tolerate or accept the abuse of entrusted power for private gain (Transparency International definition of corruption).

The HTSPE Code of Ethics has been developed to help our staff and associates work to the highest professional standards in development consulting, ensuring that the company's ethical and professional values are adhered to at all times. This Code applies to HTSPE Ltd in the UK and its companies in Pakistan and Mozambique.

### **Why we have this Code?**

The Code is written to inform staff, associates and partner companies about our intention to conduct our business in an open and transparent manner. We adhere to the belief that bribery and corruption of all kinds undermine competition, inhibit economic growth and development, undermine social development and destroy trust.

Unethical commercial activity leads to legal repercussions, damage to a company's reputation, increased business costs and vulnerability to blackmail. Internal employees lose their trust in and loyalty to management and feel pressurised if they see corrupt practices being condoned by management.

### **Client Relations**

We value highly the maintenance of good relations with our clients be they donor agencies, beneficiary institutions or partner companies which are leading consortia of which we are members. Client satisfaction is paramount but only if achieved fairly, openly and in good faith.

The company's staff, associates and partners shall inform our clients of any business connections, interests or circumstances which may be deemed as influencing our judgment or the quality of our services to our clients.

The company prohibits the offer or receipt of gifts, hospitality or other expenses where such arrangements are not bona fide expenditures and could affect the outcome of business transactions.

### **Company Owners, Shareholders and Investors**

The Code of Ethics is also a means of protecting investments made in the company and ensuring a proper return on money borrowed.

### **Suppliers**

We treat all suppliers equally and do not favour any of them beyond normal commercial consortium arrangements.

The company shall not use its suppliers or agents as a channel for improper payments. The company expects its suppliers and partner companies to similarly abide by a Code of Ethics.

The company's Terms and Conditions reserve the right to terminate an agreement should payment or receipt of bribes be uncovered.

Any commission or compensation paid to agents shall be appropriate and justifiable remuneration for services properly rendered. The relationship between the company and its suppliers and agents shall be fully documented and payments made shall be against invoices (supported with appropriate documentation) or internally generated Advance Payment requests approved at Project Director level or above.

### **Society and the wider community**

Our direct employees and associates shall comply with the spirit as well as the letter of laws in all territories that the company operates in. Neither the company's staff nor associates shall be involved in any local politics or other affairs likely to impinge on the company's business transactions.

The company forbids contributions to any political parties, organisations or individuals engaged in politics as a way of obtaining advantage in business transactions.

The company shall ensure that any bona fide charitable contributions are not used as a subterfuge for bribery.

### **Implementation & reinforcement**

New permanent staff will be introduced to this Code as part of their induction programme. This Code is to be used in parallel with our Professional Code issued to all sub-contractors and with our Team Leader Guidelines (for Team Leaders).

All internal staff and associates may report in confidence their concerns and violations of the Code to any Divisional Director and/or the Director of Human Resources. Such reports will be documented and reviewed by the Management Board at regular intervals.

No employee or associate will suffer demotion, penalty, loss of pay or other adverse consequences for reporting any attempt at bribery and corruption and for refusing to pay such bribes even if this leads to loss of business.

This Code will be issued along with all contracts or assignment agreements to individuals (long term and short term) and partner companies and they will be expected to comply with it and to report any attempts at bribery or corruption directly to the management of HTSPE Ltd.