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# | CODE OF CONDUCT AND ETHICS

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## 1 INTRODUCTION

- 1.1 For the purpose of this policy, S-RM Intelligence and Risk Consulting Limited and its subsidiary companies shall be collectively referred to as "**S-RM**" or "**We**".
- 1.2 At S-RM a reputation for professionalism and integrity in the way we manage our business is critical in allowing us to realise our corporate strategy and fulfil our corporate responsibilities. This approach also preserves the licences we have in order to enable us to operate, and strengthens and protects our position in the market place.
- 1.3 This Code of Conduct and Ethics (the "**Code**") outlines the standards of conduct and behaviour expected by all Staff. The Code is supported by the other documents in our corporate responsibility framework. This includes our Conflicts of Interest Policy and Complaints Policy arrangements.
- 1.4 All new starters receive a copy of the Code when they join. This Code applies to staff members engaged or employed by S-RM or associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as 'employees' in this policy).
- 1.5 As an integral part of maintaining our high standards, employees undergo an annual appraisal during which they will be assessed on how their behaviour demonstrates their compliance with this Code of Conduct and Ethics.
- 1.6 Anyone who believes that S-RM is not meeting the standards of conduct and ethics outlined in this document can raise the issue by phone, email, or in person with the Legal and Compliance Team at S-RM. Any concerns will be investigated promptly and in the utmost confidence and good faith. No one will be discriminated against in any way as a result of reporting an issue.

## 2 FAIR COMPETITION

- 2.1 S-RM is subject to a range of legislation and regulatory requirements as well as voluntary guidelines that apply to all the clients that we work with. These include anti-bribery and corruption legislation, data protection legislation and sanctions and prohibition legislation, as well as the conditions of operating licenses, industry specific requirements, the International Code of Conduct ("**ICoC**") and the UN Voluntary Principles, to include (for example) a ban on all forms of child labour, including use of the same within our supply chain.

## 3 BUSINESS INTEGRITY

- 3.1 S-RM upholds the principle of a free market and meets the requirements of relevant laws, regulations and industry standards. We believe that it is important to follow best practice and to avoid unethical and unfair practices. We will not collaborate with competitors against the interests of our clients and at S-RM we will not become involved in any agreements, arrangements or practices that prevent, restrict or distort competition.

## 4 BRIBERY AND CORRUPTION

- 4.1 S-RM operates an Anti-Bribery and Corruption policy. We understand the negative effects that bribery and corruption can have on our clients and the communities in which we operate. S-RM maintains a zero tolerance policy towards bribery and corruption and will never offer or accept bribes of any kind. We demand the same of our business partners. We do not accept or make inducement or facilitation payments of any kind. At S-RM we require that Employees do not accept any form of personal payment or other form of inducement; If We come across a situation where a bribe has been offered or solicited it must be reported immediately using the procedure set out in S-RM's Whistleblowing Policy, and a formal investigation will be carried out. Further, we will not make payments through a third party that might be interpreted as a bribe.
- 4.2 Every employee at S-RM is required to read and acknowledge in writing their understanding of and compliance with S-RM's Anti-Corruption & Bribery Policy.

## 5 CONFLICTS OF INTEREST

- 5.1 S-RM operates a Conflicts of Interest Policy to avoid, or properly manage and identify conflicts of interest. Every employee at S-RM is required to have read and acknowledge in writing that they understand and will comply with the Conflicts of Interest Policy.

## 6 DATA PROTECTION

- 6.1 At S-RM, information about our clients, employees and other business contacts must be held in the strictest confidence as well as in a manner compliant with the national legislation of the countries in which we operate. At S-RM we have adopted a Data Protection Policy.

## 7 RELATIONSHIPS WITH CLIENTS

- 7.1 S-RM seeks to maintain long term relationships of mutual benefit with its clients and promotes trust, transparency and fairness in all its dealings with clients and third parties.
- 7.2 We uphold the highest standards of client confidentiality. Confidentiality covenants form part of all employee contracts. These covenants emphasise the importance of non-disclosure of S-RM business activities to third parties. Additionally the Staff Handbook, applicable to all employees, highlights confidentiality obligations. We adhere to a strict end of day clean desk policy. Repeat non-compliance with this policy may be addressed in employee annual appraisals.

## 8 FURTHER INFORMATION

- 8.1 Further information on this Code and the compliance policies in place is available from S-RM's Legal and Compliance Team.
- 8.2 This code applies across S-RM, regardless of the jurisdiction in which each office, subsidiary, sub-contractor, consultant or employee operates.