



Business Code of Ethics

Document Control	
Approved by:	MannionDaniels' Directors
Responsible Owner:	Director, Head of Operations
Created:	31 January 2015
Revised:	10 January 2023
Approved:	10 January 2023
Next Review:	10 January 2024
Version:	4



Introduction

MannionDaniels works for a more healthy, equitable, inclusive, safe and sustainable world. We partner with communities and clients worldwide to provide advice and support in strategic planning, policy governance, and programme management, with a particular focus on international health and social care. Much of our work focuses on reaching poor and vulnerable people, especially in fragile and conflict affected states.

MannionDaniels is committed to ensuring the highest standards of conduct in the delivery of our services and maintaining compliance with all applicable policies, laws, rules and regulations. This is reinforced by our business code of ethics which outlines our commitment to upholding ethical values and practices. We seek to create an environment where our employees can feel respected and valued, and in turn can treat our partners, clients,

communities and the individuals we serve with the same ethical standards.

As a company, we also support the ten principles of the UN Global Compact with respect to human rights, labour, environment and anti-corruption. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations - particularly the Sustainable Development Goals.

This code of ethics applies to all staff, consultants, partners, suppliers, authorised representatives, and all others. We are all responsible for upholding our standards of conduct and ethics, making decisions with integrity, doing the right thing, and reporting potential issues. The key to maintaining a healthy work environment is for everyone, individually, to take action to ensure we are adhering to our values.

Our Values

Our Business Code of Ethics sets out the values, business culture and practices that we aim to demonstrate and expect of all our partners, suppliers and consultants throughout our supply chain. It is anchored by seven values and underpins all that we do. Below is a brief description of what each value means to us:

- **Innovation:** We encourage independent thinking, ingenuity and multidisciplinary collaboration in everything we do.
- **Inclusion:** We value diversity and unique contributions and foster an open and inclusive environment.
- **Integrity:** We hold the highest standards in professional behaviour.
- **Accountability:** We take responsibility for our actions whether as individuals or as a team.
- **Performance:** We demand of ourselves the highest technical and professional standards. We practice a rigorous, evidence-based approach to technical work and engage in continuous professional learning.
- **Transparency:** We are committed to transparency in all business dealings. We take a zero-tolerance approach to corruption, bribery, fraud, tax evasion, human rights violations, sexual abuse and modern slavery. We hold ourselves and our delivery chain partners to high transparency standards and practices.
- **Environment:** We recognise the link between human health and the environment and aim to protect the natural world in all our work.



Code of Ethics

In our conduct of business activities, MannionDaniels, our staff, partners, suppliers and consultants throughout our supply chain pledge the following:

Commitment to high standards of ethical conduct and practice

- Ensure consistent understanding of business ethics at all levels
- Continually enhance knowledge of all relevant laws and regulations in the countries in which the organisation operates, either directly or indirectly
- Commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour
- Conduct all business relationships with respect, honesty and integrity, and avoid causing harm to others as a result of business decisions
- Treat all stakeholders fairly and impartially, without discrimination or favour
- Accept our fundamental duty of care for those who directly or in-directly engage in activities with us, especially children, young, and vulnerable adults
- Promote gender equity and inclusive workplaces where persons with disabilities and other disadvantaged or vulnerable groups are reasonably accommodated
- Uphold the dignity and respect of all people, take preventative steps to ensure a safe environment and respond quickly and appropriately to all safeguarding concerns including sexual exploitation and abuse
- Actively support and promote corporate social responsibility (CSR)
- Avoid any business practices which might bring the business or profession into disrepute

Professionalism through the supply chain

- Use procurement strategies to drive unethical practices from the supply chain
- Ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels
- Put ethical policies and procedures in place, that are regularly monitored and updated, and ensure compliance
- Mandate the education and training of all staff involved in sourcing, supplier selection and supplier management to professional standards
- Do not accept or offer business courtesies of any value, if they could be perceived as affecting our objectivity or influencing business decisions
- Adhere to the gift and hospitality guidelines in the company's anti-corruption, fraud and bribery policy in situations involving business courtesies to or from non-government employees, such as current or potential suppliers or subcontractors
- Maintain and review 'whistle-blowing' procedures for the reporting of observed acts of corruption/bribery/fraud/extortion, and communicate these procedures to all company staff, independent consultants, and consultants' and contractors' staff.



Acceptance of accountability

- Accept accountability and take ownership of business ethics
- Foster a culture of leadership by example
- Take steps to prevent, report and remedy unethical practices
- Provide a safe environment for the reporting of unethical practices
- Follow guidance in the company finance and accounting policy, generally accepted accounting principles and comply with financial accounting standards
- Record transactions, time, and work performed completely and accurately

Promotion of fair and healthy competition

- Maintain a level playing field in the course of doing business
- Foster fair play and promote healthy competition to keep our industry dynamic and robust
- Arrive at prices in our proposals independently, without disclosing the prices to any other organisations that are submitting a proposal for a tender
- Never enter into agreements or understandings with competitors concerning prices or other collusive bidding practices.

Objectivity in decision-making

- Honor responsibilities to MannionDaniels and its clients by avoiding business and financial actions, relationships, or situations that might conflict — or create the appearance of a conflict
- Disclose all potential conflicts of interest to a supervisor, and seek advice to resolve them
- Don't use proprietary information belonging to the company, its partners, or suppliers to influence personal decisions or the decisions of others
- Participate in social causes or in civic, political, or religious activities unrelated to the work of MannionDaniels only on our own time and at our own expense

Integrity of recruitment and procurement processes

- Recruit and hire individuals in a responsible manner, seeking to eliminate discrimination or bias
- Refrain from bidding for and/or performing any service unless judged competent to do so
- Advocate the concept of "selection by ability" for consultants, firms and organisations, adhering to the principles of fair and transparent procurement throughout the tendering process
- Neither wilfully attempt, nor otherwise sanction attempts to influence the decision of any tendering body through deliberate misrepresentation of ability, or other acts of corruption
- Neither carelessly nor intentionally do anything to injure the reputation of a third-party, nor attempt to prejudice the appointment of rival individuals/firms through negative campaigning



- Engender a sense of trust and respect with all consultants and firms associated with MannionDaniels
- Don't seek, receive, or use competitors' confidential or proprietary information, such as cost, or pricing data submitted as part of a proposal
- Uphold clients' procurement integrity by seeking information for the preparation of proposals ambitiously yet always fairly
- Don't seek, accept, or use client proprietary, procurement or source selection information
- Always refuse proprietary or source selection information that improperly comes into our possession, and immediately report the incident to a supervisor.

Protection of assets, information, privacy and confidentiality

- Use assets as the company or clients authorised them to be used
- Use information provided through company systems for company business purposes only
- Protect proprietary information that gives, or may give the company a competitive advantage
- Follow laws governing the use of intellectual property, including software licenses, patents, copyrights, and trademarks
- Adhere to the standards set out in the data security policy, the information security and privacy policy
- Protect sensitive and personally identifiable information from unauthorised exposure and reduce the volume and types of personally identifiable information to only that which is necessary for business functions
- Report any actual or suspected loss of information or attacks against our systems.

Adherence to UK law and international governance

- Prevent, detect and report fraud, waste, abuse, or any other prohibited acts or suspected violations to a supervisor or via the whistleblowing mechanism
- Cooperate fully with any investigations of reported fraud, waste, abuse, or any other prohibited acts
- Immediately report to the relevant authority any known act of human rights abuse, including modern slavery, or human trafficking committed by staff, consultants, partners, suppliers or any third party in the course of their commission on any bid or project
- Do not tolerate or condone the engagement, directly or indirectly, in terrorism or in the financing of or support to terrorists
- Use best efforts to ensure that payments provided to or by the company do not provide direct or indirect support or resources to entities and individuals involved in terrorism
- Do not tolerate or condone the transportation, sale or otherwise trafficking of human beings for profit or otherwise. Regardless of the jurisdiction in which the Company is registered or doing business, these activities are prohibited
- Abide by the sanctions put in place by the international community, including but not limited to the United Kingdom Foreign and Commonwealth Office, the European Union, United Nations, and the United States Office of Foreign Assets Control.



Getting Assistance and Raising Concerns

MannionDaniels provides the guidelines in this document to address situations that you are likely to encounter. We recognise that staff, consultants, subcontractors, suppliers, clients, and third parties may face complex issues that have no apparent precedent, or for which there is no easy answer. We promote a consultative culture at MannionDaniels and are committed to working together to find solutions in these circumstances.

In addition to established company relationships, we have created a support network that is available for consultation and advice, to help each of us live up to our commitments under the code of ethics. Here are some of the places to go for advice and guidance:

- The Operations and Compliance team
- The Human Resources team
- Senior Management team
- Leadership team

You can also submit concerns and reports through our [whistleblowing hotline](#). This is an anonymous, free-to-call and confidential service. The UK Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013 protect staff, consultants, subcontractors, suppliers, clients, and third parties who report concerns involving fraud, waste, abuse, or other violations of laws or regulations that they reasonably believe have occurred. MannionDaniels conducts inquiries into or investigations of all reports. We make every effort to maintain confidentiality or anonymity to the extent possible under the law; however, disclosure may be necessary in some cases to conduct an investigation effectively. If substantiated, violations are resolved through appropriate corrective action or discipline, including termination of employment. Violations may also result in civil or criminal penalties.