



Steffensen  
Consult ApS



Code of Conduct

Including Anti-Corruption Policy and Compliance Programme

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Denmark,

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## Background

The **Code of Ethics and Corporate Conduct** is a frame of reference describing the principles for compliance with business ethics in Steffensen Consult ApS, and listing principles of professional conduct, including rules and standards of corporate behaviour.

The Code guides management and all employees, associates or any other agent acting on behalf of Steffensen Consult ApS (hereafter referred to as: Consultants). It provides guidance to consultants at work and during any professional interaction between consultants and their clients, potential clients, competitors or other business partners.

In recognition of their obligations to clients, to the public at large and to their profession, all consultants agree to comply with the company's Code and to uphold the principles in every undertaking in which Steffensen Consult ApS has a stake. The Code shall also apply in joint projects with outside business partners, while making sure that all partners seek to comply with rules of conducting business which correspond to our own.

This Code of Ethics and Corporate Conduct provides evidence of our commitment and ability to implement good corporate governance and ethical business practices.

All consultants have access to the Code and must abide to the rules and standards at all times.

## Social Responsibility

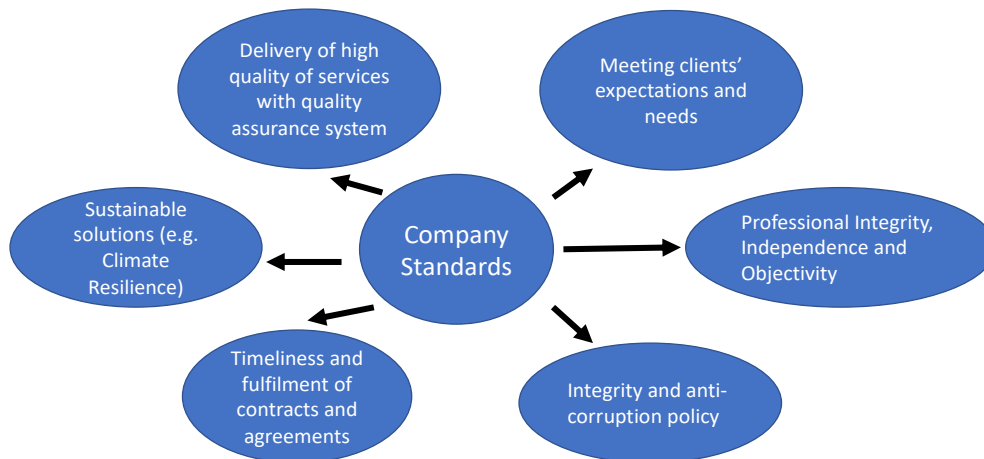
Steffensen Consult ApS provides management consultancy services to governments and development partners in the area of Governance, public financial management and administration. Given this particular role, the company accepts its specific responsibility to society, and strives to operate in a socially responsible manner and follow high standards of ethical conduct within the framework of the legislation of the countries in which it operates. The company thereby actively contributes to furthering sustainable development.

Accordingly, consultants working under Steffensen Consult ApS are committed to act as responsible corporate citizens, this includes their commitment to

- Work towards sustainability and sustainable solutions,
- Respect the rules of law governing the consulting business, and
- Respect human rights and political, cultural and religious customs of the countries they work in.

## Core principles

The Code of Ethics and Corporate Conduct is based on **six core principles, see below:**



These principles are further detailed below.

### 1. Delivery of High Quality Services and Quality Assurance

Steffensen Consult ApS is committed to the provision of high quality services to its clients. The company therefore:

- only accepts assignments in areas that match the qualifications, experience and capacity of its consultants and the firm as a whole. The company's management therefore rigorously selects and supervises its employees, associate consultants as well as any other partner.
- is committed to continuously improve its knowledge base, capacities and tools in its areas of expertise, and to extend to its clients the benefits of professional know how and achievements.
- provides continuous quality assurance and reviews its services to the extent necessary in order to minimize errors for the maximum benefit of the client.
- ensures that all assignment outputs are shared and checked with senior management prior to submission to clients

Steffensen Consult ApS encourages its individual consultants to pursue research activities of relevance to its core businesses and will wherever financially feasible prioritise assignments of policy orientation and with research elements.

## 2. Meeting the Client's Expectations and Needs

Steffensen Consult ApS regards the client's needs and requirements as paramount and takes special care to act in the best interest of the client. In line with this principle, consultants working under Steffensen Consult ApS:

- hold all information concerning the affairs of clients in the strictest confidence and do not disclose proprietary information obtained during the course of the assignments or consultancy service.
- ensure that advice, solutions and recommendations are based on thorough, impartial analysis and consideration of all available facts and relevant experience. They also guarantee that any professional advice provided is realistic, practicable and clearly understood by the client.
- ensure that the client is kept fully informed about any progress made during the assignment and diligently take note of any feedback provided by the client.
- act with courtesy and consideration towards the individuals contacted in the course of undertaking assignments.

## 3. Integrity, independence and objectivity

Steffensen Consult ApS is committed to rigorously maintain their professional integrity, independence and objectivity. The company will strive to accommodate clients' interests without compromising legislation or the Code of Ethics and Corporate Conduct, and to maintain an open and transparent dialogue. Consultants shall avoid any action inconsistent with the company's professional obligation or which in any way might be seen to impair the individual consultant's integrity. When formulating advice and recommendations, consultants will be guided by the objective view of the client's best interests. Following these principles, consultants:

- do not accept assignments that might lead to a conflict of interest. They will not serve a client under circumstances which are inconsistent with the consultant's professional obligations or which in any way might be seen to impair the consultant's integrity. Wherever a conflict of potential conflict of interest arises, the consultant will withdraw from the assignment, remove the source of conflict or disclose and obtain the agreement of the parties concerned as to the performance or continuance of the engagement.
- disclose at the earliest opportunity any special relationship, circumstances or business interests which might influence or impair the consultant's judgement or objectivity on a particular assignment. This requires the prior disclosure of all relevant personal, financial or other business interests which could not be inferred from the description of the services offered.

- will not use any confidential information about the client's affairs, elicited during the course of an assignment, for professional benefit or for the benefit of others outside the client organisation. They will undertake everything to safeguard the client's legitimate interests, including ensuring a highest level of confidentiality.
- will advise the client of any significant reservations they may have about the client's expectation of benefits from an engagement. They will not indicate any short-term benefits at the expense of the long-term welfare of the client without advising the client of the implications.

## 4. Timeliness and fulfillment of contracts and agreements

Consultants working for Steffensen Consult ApS accept their responsibility towards the consulting profession, and are committed to uphold and continue to enhance its standing and public recognition. While practicing and providing services, they will comply with all relevant laws, abstain from using or misusing power or position, preserve confidentiality within and outside the company and between one client and another and abstain from using any information acquired in the course of professional duties for personal advantage.

Steffensen Consult ApS:

- supports quality based selection for the contracting of its services and competes with other consulting firms on the basis of fair principles.
- contributes to building good business relationships by referring to other companies and their actions in an objective manner.
- adopts objectivity and impartiality when assessing the work performed by other consulting companies.
- respects copyrights.

## 5. Integrity and anticorruption policy

Steffensen Consult ApS' commitment to ethically based business practices is based on a strong belief in values of integrity and transparency. Steffensen Consult's policy on anti-bribery and anti-corruption is guided and inspired by the work of Transparency International and the 'Business Principles for Countering Bribery'<sup>1</sup> in particular.

These Principles are based on a commitment to fundamental values of integrity, transparency and accountability, which we fully subscribe to. Steffensen Consult ApS recognises that anti-corruption and anti-bribery efforts need to be tackled at different levels, and thereby have a bearing on the company's values, policies, processes, structures and leadership.

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<sup>1</sup> *Transparency International and Social Accountability International 2003: Business Principles for Countering Bribery – an essential tool for business* [http://www.transparency.org/global\\_priorities/private\\_sector/business\\_principles](http://www.transparency.org/global_priorities/private_sector/business_principles)

Steffensen Consult ApS is bound by values of integrity, transparency and responsibility and conduct business to the highest ethical standards, and therefore do not tolerate bribery and corrupt behaviour. Violations of anti-corruption laws can lead to costly enforcement actions against the company and the individuals involved, damage to the company's good standing and its consultants, and criminal penalties against both the company and the individuals involved.

As it is hard to formulate a set of guidelines that applies to every possible situation that may raise questions under the anti-corruption law of each country in which Steffensen Consult ApS offers its services, each consultant is advised to use common sense in identifying an activity that may violate the company's anti-corruption policy or be subject to scrutiny by law enforcement officials, and to apply the principles in this code. It is the responsibility of each consultant to contact the management team if s/he has any question about whether his or her action could potentially violate anti-corruption law.

## 6. Sustainable Solutions

Steffensen Consult ApS always strives to offer sustainable solutions with longer term impact and with due considerations to climate change, vulnerable groups, environmental safeguards, and culture.

### General Anti-Corruption Policy

It is always unacceptable to promise, offer or accept bribes or other improper payments and favours, which can include, for example gifts or entertainment. Improper payments or gifts promised or offered constitute bribery and corruption:

- if it is illegal
- if it creates an obligation or perception of obligation for either party
- if it cannot be transacted transparently
- if it is unreasonable in terms of value and/or frequency
- if the intention of the payment or favour is to obtain or retain undue personal or business advantage; to encourage others to refrain from acting in relation to performance of their duties; to willingly refrain from performing our own duties
- if exposure is likely to cause embarrassment to the individual concerned or to the company.

In accordance with this spirit, Steffensen Consult ApS:

- does not offer gifts or accept bribes in any form, including kickbacks, on any portion of a contract payment, or the use of other routes or channels to provide improper benefits to its clients. Equally, it prohibits its consultants from arranging or accepting a bribe or kickback from clients or potential clients, for the employee's or associate's benefit of that of family, friends, associates or acquaintances.

- does not make facilitation payments<sup>2</sup> which are considered a form of bribery.
- does not accept the offer or receipt of gifts, hospitality expenses or expenses whenever such arrangements could affect the outcome of business transactions and are not reasonable and bona fide expenditures.
- does not channel improper payments through agents or other intermediaries.
- does not make financial contributions to political parties or interest groups for the sake of gaining a special advantage or winning a specific assignment.
- does not offer philanthropic donations, community investment or political contributions to try to obtain or retain undue personal or business advantage or to refrain or encourage others to refrain from acting in relation to the performance of his or her duty.
- does not engage in blackmail or other forms of extortion to gain advantages and does not succumb to extortion by other parties to provide such advantages.
- actively resist extortion and all other demands for improper payments made under coercion. In exceptional circumstances if minor payments must be made in order to secure short term personal safety and/or immediate business continuity, such payments must be accounted for by local senior management and subject to audit.
- does not condone corruption in connection with the performance of assignments, and requires the same standard of conduct of Steffensen Consult ApS adherence from any other business partner and customer.
- may not privately use or offer to others access to or use of company resources including assets, or intellectual property without advance authorisation from their line manager.
- must declare to the management any personal conflict of interest. It is deemed to be a conflict of interest where (i) an individual's duties involve transactions with another undertaking and (ii) the individual has an interest, financial or otherwise in the undertaking concerned
- shall not take advantage of their influence as a representative the company in order to accept favourable terms and conditions including discounts and other incentives, for personal transactions with an outside entity.

## Implementation of compliance

Steffensen Consult ApS' strong commitment to countering corruption is complemented by a monitoring mechanism to follow up on any deviation from ethical corporate standards. The management team is responsible for implementation of this policy including regular training and monitoring of compliance and will review this policy and monitor performance and compliance to this policy at least annually.

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<sup>2</sup> Facilitation payments are small payments to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has no legal or other entitlement.



## General principles

In addition to the above principles, there are more general principles outlined below:

- Those who work for or on behalf of Steffensen Consult will not be penalised in any way for business advantage of Steffensen Consult lost due to adherence to this policy.
- Any actual or perceived threat to Steffensen Consult ApS or its consultants as a result of a refusal to engage in bribery, corruption or extortion or to make inappropriate payments must be immediately reported to the management team.
- Breach of this policy may lead to disciplinary action for consultants. For other agents (e.g. sub-contractors), a breach of this policy may lead to termination of the relationship with Steffensen Consult ApS.

## Diligence Reviews

Steffensen Consult ApS will undertake thorough diligence reviews which are vital for ensuring that the company's compliance programme is efficient and effective. Such reviews extend to activities, such as self-monitoring, vetting new consultants or business partners, and assessing risks when joining forces with other consulting firms.

## Whistle Blowing

Steffensen Consult ApS encourages all consultants to speak out if they have legitimate concerns about the behaviour of individual consultants or groups of consultants, if they seem to be in conflict with the principles of the company's anti-bribery principles. Any reporting on ethical misconduct will be treated with absolute confidentiality. The concerns and rights of whistleblowers will be properly recorded and investigated. The management will thereafter decide whether disciplinary action should be taken against the consultant. Individuals reporting suspected misconduct will not be penalised.

## Books and records

Steffensen Consult ApS' books, records and accounts are being kept with details and accuracy such that they fairly reflect all transactions and dispositions of assets.