



## ALL NATION SECURITY & INVESTIGATION SERVICES INC.

5<sup>th</sup> Floor, DRB Building, E. Aguinaldo Highway, Palico IV, Imus City, Cavite, 1403  
Telephone No. (046) 472 – 6029 / (02) 8925-7363 / E-mail: allnation\_1996@yahoo.com

### POLICY ON STANDARDS OF BUSINESS CONDUCT

#### I. INTRODUCTION

**All Nation Security and Investigation Services, Inc.** is committed to ensuring that its employees and independent members practice the highest standards of conduct and behavior. This policy sets out those expectations and provides supporting guidance. The aim of this policy is to ensure that arrangements are in place to support employees to act in a manner that upholds the standards of business conduct. It also sets out specific arrangements for the appropriate declarations of interests and acceptance/refusal and record of offers of gifts, hospitality and sponsorship. It also seeks to clarify the relative responsibilities of every employee in the discharging of this policy and adhering to the standards of business conduct.

#### II. GIFTS, HOSPITALITY AND SPONSORSHIP

**Gift** is defined as any item of cash or goods, or any service, which is provided for personal benefit by a third party e.g. a supplier or contractor. The definition includes prizes, draws and raffles at sponsored events. It is an offense to accept any money, gift or consideration as an inducement or reward from a person or organization holding or seeking to hold a contract with the company. Such gifts should be refused and if they have already been received, they should be returned clearly advising why they cannot be accepted.

No gifts, unless they are of low intrinsic value for example diaries, calendars, etc. are to be accepted from suppliers and contractors. Gifts outside this definition should be politely declined. While it is not necessary to declare gifts of low intrinsic value, where other items are offered and declined a gifts and hospitality form should be completed. This will allow the management to monitor when such organization are inappropriately offering gifts or potential inducements. Under some circumstances suppliers may send gifts to all of its clients as custom and practice such as hampers at Christmas. Whilst such practices should be discouraged and it is not acceptable for staff to personally accept these gifts, following discussion with the supplier, it may be considered appropriate to accept the gift and use it for the benefit of charitable funds. Any acceptance of a gift needs to be justified. The burden is to make sure the acceptance of a gift will not be misconstrued.

**Hospitality** is where there is an offer of food, drinks, accommodation, entertainment or entry into an event or function by a third party, regardless of whether provided during or outside normal working hours, for example, cheque presentations in respect of fundraising events, or tickets/seats for a show or sporting event. All employees particularly security personnel in the field should refuse hospitality which may compromise or may be seen to compromise their professional judgement or integrity, or which seeks to exert influence to obtain a preferential consideration. Any employees in contact with contractors should be particularly mindful of accepting any hospitality that might later be misconstrued as impacting on strict independence and impartiality.

Any acceptance of hospitality needs to be justified. Think about the context in which the offer has been made, and the effect on the employee's position. For example, is the hospitality likely, or could it be seen as likely, to influence. The burden is to make sure that the acceptance of hospitality will not be misconstrued.

**Sponsorship** is an offer of funding to an individual or group or person from an external source, whether in cash, goods, services or benefits. Sponsorship is sometimes provided by organizations to allow members of staff to attend conferences or working visits to view equipment. It may also include sponsorship of posts and research and development.

No sponsorship should be accepted without the prior agreement with the management or the Office of the General Manager. If sponsorship is inappropriately offered and/or declined this should also be declared. Any acceptance of sponsorship needs to be justified. Think about the context in which the offer has been made, and the effect on the employee's position. For example, is the sponsorship likely, or could it be seen as likely, to influence? The burden is to make sure that the acceptance of any sponsorship will not be misconstrued.

### **III. APPROVAL PROCESS**

Prior to the acceptance of any gifts, hospitality and sponsorship as detailed above, members of staff should seek approval from the management. If the management is in any doubt or the activity is complex and/or of high value, advice should be sought from the Board of Director prior to approval.

### **IV. PREFERENTIAL TREATMENT IN PRIVATE TRANSACTIONS**

All officers and staff of the company must not seek or accept preferential rates or benefits in kind for private transactions carried out with which they have, or may have, official dealings with on behalf of the company.

### **V. CONTRACTS**

All staff in contact with suppliers and contractors, particularly if authorized to sign purchase orders or place contracts for goods, materials or services, shall adhere to accepted professional standards.

### **VI. FAVOURITISM IN AWARDING CONTRACTS**

Fair and open competition between prospective contractors or suppliers for contracts is a requirement of the company on public purchasing for works and supplies. No private or public organization which may bid for the company business should be given any advantage over its competitors, such as advance notice of the requirements. This applies to all potential contractors, whether or not there is a relationship between them and the company, such as a long-running series of previous contracts.

Each new contract should be awarded solely on merit, taking into account the requirements of the company and the ability of the contractors to fulfill them. The management will ensure that no special favor is shown to current or former staff or their close relatives or associates in awarding contracts to private or other businesses run or employing by them.

### **VII. FAILURE TO ADHERE TO STANDARDS OF BUSINESS CONDUCT**

Anyone who has cause to believe that an employee has failed to comply with any of the requirements of this Policy is encouraged to report their concerns to the Office of the General Manager (OGM). If any employee fails to declare an interest, gifts, hospitality, sponsorship, or secondary or private employment as defined within this policy, disciplinary action may follow. The action taken will depend on the individual circumstances and will be in accordance with the appropriate policy. Under certain circumstances, failure to follow this policy may be considered gross misconduct.

This also extends to include the inappropriate acceptance of any gifts, hospitality and sponsorship. In addition to any potential disciplinary action being taken if there is any suspicion that fraud, corruption and/or bribery has been or is being committed, all such cases must be reported at the earliest possible opportunity to the OGM.