

# CODE OF ETHICS POLICY

Approved By: James Lawrence

Position: Director

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Classification: PUBLIC



## CODE OF ETHICS

### Overview

Peregrine Risk Management follows a core set of principles to support international operations and this document will evidence how we achieve this. Due to the type of activities conducted around the world supporting a diverse number of clients and operations it is vital, that we as an organisation, accept risk but also ensure that our approach is risk-based. By following a risk-based approach and adopting key principles ensures that our people, contractors, and clients are safeguarded.

This approach includes compliance and ethics which ensures we remain objective and unbiased no matter the geographic or political belief. Peregrine will always deliver a balanced truth based on our integrity and commitment to act lawfully and in-line with local laws and regulations where our people and clients operate around the world.

Peregrine demands the highest standards of professionalism and organisational integrity to achieve a sustainable business, in often high risk and complex environments, with long term goals and market share.

### Scope

This policy applies to all employees, contractors, and directors within Peregrine Risk Management Ltd.

### Supporting Documents

This 'Code of Ethics' Policy is also supported by the following documents.

- QM PO001/19 Mission, Values & Vision Statement
- QM PO012/19 Code of Conduct Policy
- HR PO020/20 Human Rights Policy
- HR PO013/19 Whistle Blowing Policy
- HR PO015/20 Grievance Policy
- QM PO004/19 UK GDPR Policy
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For any clarification or for guidance on how to apply this policy contact your line manager or Head of Technical Solutions and Compliance for further support. Further guidance can be obtained from the Peregrine Ethics committee.

If at any point you are aware of any breach in ethics that are outlined in this policy, or suspected breach, please follow the [Whistle Blowing Policy and Grievance Policy](#).

## POLICY REQUIREMENTS

### Peregrine Risk Managements Ethical Commitment

Our business objectives and expertise often see's us assist clients in sensitive, controversial, dangerous and morally complex situations as part of our daily business. By applying these ethics in difficult and challenging situations will promote integrity and an opportunity to help our clients is benign, complex, and high-risk operations and regions. For Peregrine, it is doing the right thing, which is more important than a swift financial gain.

## Our Values

Peregrine Risk Management's core values can be seen at [Mission, Values & Vision Statement](#)

## Business Integrity

Peregrine Risk Management follows a robust [Code of Conduct Policy](#) which goes beyond compliance with local laws and regulations. In short, peregrine does not take part in any unlawful acts which include bribery (direct and indirect), engage in any corruption which includes tax evasion. All Peregrine employees and contractors are expected to use their professional judgement to avoid malpractice and where applicable report any breaches by following our [Whistle Blowing Policy](#).

## Conflict of Interest

All employees and contractors are to avoid all situations or transactions where personal interests could compromise Peregrine's business objectives, policies and client relationships. This includes but is not limited to; utilising Peregrine's business relationships for personal gain, divulging business information to a third party or acting in a manner which can be constructed as 'insider trading'.

Personal interest can be classified as direct or indirect and refers not only to the employee or contractor but their family members, friends, and colleagues. All Peregrine employees and contractors must disclose any personal conflict or perceived conflict to their line-manager by following [Code of Conduct Policy](#)

## Confidentiality

Peregrine Risk Management takes the confidentiality of its clients seriously and will not reveal their identity without express permission. All documentation entrusted to Peregrine will be handled securely and will remain confidential under our UK [GDPR Policy](#). A breach or suspected loss needs to be reported to the Head of Compliance (Data Protection Officer/DPO).

## Human Rights

Adherence and the respect for human rights runs through our DNA and our business, employees and contractors are accountable to ensure within their working environment everybody is treated with respect and dignity. Please see our [Human Rights Policy](#) Within this policy Peregrine shows its commitment and alignment to the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights within the UN Global Compact.

## Political Activities

Peregrine Risk Management follows a strict policy of 'political neutrality', and as a business does not make donations to political parties, organisations or individuals involved either indirectly or directly with politics. However, it is important to stress that Peregrine will conduct business and cooperate with governments and other official bodies in the development of policy, legislation, capacity building and other risk management services where we can deliver specialist expertise around our core business activities without the involvement of political beliefs.

Peregrine's employees and contractors are entitled to their own political views and activities, but the use of Peregrine's name, premises or equipment cannot be used to promote or associate individual views and beliefs.

## Business Relationships

When deciding whether to engage in new business activities and relationships Peregrine Risk Management will take into account ethical and reputational issues as well as legal compliance.

Peregrine expects our employees, contractors, suppliers, sub-contractors, partners to adhere to guiding principles that are consistent to ours.

## **AUTHORITY AND RESPONSIBILITY**

### **All Peregrine Employees and Contractors**

- Peregrine requires all employees and contractors to abide and follow this code, no matter the role, activity or environment.
- Employees or contractors who fail to abide this code may face disciplinary action, which includes dismissal or contract end.
- Any breach of this code, or suspected breach should be reported immediately to their line manager or by following the Peregrine Whistle Blowing Policy

### **Managers**

- The Board of Directors will provide full support to Peregrine employees and contractors who find themselves in difficult situations or fail to win business because of abiding by the code.

### **Review**

This policy is to be reviewed annually or if there is a significant event that affects the integrity and adherence to this policy.



Director: **James Lawrence** SIGNED: \_\_\_\_\_

This Code of Ethics is available to all personnel including visitors and contractors. All employees are encouraged to read it and communicate any query to the Directors. A copy of the Code of Ethics can also be obtained on request (to any interested parties) from our Head Office.

# Peregrine

Risk Management



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