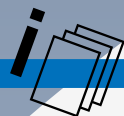


BUSINESS INTEGRITY MANAGEMENT SYSTEM



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Message from the Board

We together have the exciting opportunity to build a strong DevConsultants Limited and give meaning to our promise, "Leading today for better tomorrow".

A fundamental part of our promise is how we behave and what principles guide our decisions. Our Code of Business Principles explains what our company stands for. The code provides you with a compass for decisions and actions. It will also help you to explain to others what they can expect from us and what we expect of them.

Our company is a leading consulting firm in Bangladesh. It is our prime mission to provide multi-disciplinary services for the sustainable development of our living environment, based on mutual loyalty towards our clients and better understanding with employees, partners and strategic partners. DevCon is renowned for its, reliability and integrity which it maintains in the field of business activities and strives to uphold the highest standards of conduct.

In line with ISOQAR 9001:2015 Quality Management System (QMS) and ISOQAR 14001:2015 for Environmental Management System (EMS) and FIDIC rules of business, we have set up a Business Integrity Management System (BIMS), with an accompanying Compliance Program to safeguard the Business Principles. We act ethically and with transparency in our business dealings, respecting the customs and laws of our working environments. Our

Code of Business Principles is shared across the company and communicates the standards that are required worldwide. It is a guide for both a strategic and day-to-day level.

We sincerely expect all DevCon employees and line management to comply within the spirit of business principles and shall extend their commitments to become transparent and fully accountable. We also expect that they will engage in ongoing dialogue, suggestions and dilemmas related to practicing of integrity policies, so that the code remains meaningful and effective.

Sincerely,

Anisur Rahman
Chairman, Board of Directors



Our Vision

To be a strong, independent engineering consultancy – sustainable and leading in our markets.

Together we create an inspiring environment that we can be proud of and people will want to join.

Our Mission

Work closely with our clients to find sustainable, integrated and pragmatic solutions.

Our Values

Our values of Integrity, Team Spirit and Excellence are at the core of our culture, by which we operate and look for solutions.

Business Integrity

Introduction

DevConsultants Limited is committed to conducting business honestly, ethically and with integrity. We require our Executive Directors, Directors, officers, and employees and those of its affiliates and subsidiaries to comply with this Policy. In addition, we require third parties acting on its behalf to comply with this Policy.

Code of Conduct

The DevConsultants Limited (DevCon) has adopted FIDIC's model code of conduct in line with ISO 9001:2015 (QMS) & ISO 14001:2015 (EMS) operating practices for consulting firms.

The codes of conduct form a part of the corporate policy together with the mission and the values.

Integrity Code

We have zero tolerance for non-compliance with our integrity code. This includes amongst others policy against corruption, bribery, collusion, extortion, fraud, discrimination, documentation of information, confidentiality and other forms of improper actions for corporate or personal financial gain.

Our principles are made concrete through our Business Integrity Management System (BIMS) and the accompanying Compliance Program. This confirms that our policy to prevent corruption corresponds to international best practices.

Violations of our principles, or even suspicions there-of, by us, our partners or any associated party should be reported and

investigated as per the procedures described in BIMS. This could lead to further clarifications, mitigating actions or sanctions, including termination and legal proceedings.

Integrity: The top most Agenda

To become a successful service in the competitive consultancy market, DevCon emphasizes to uphold the highest standard of conduct. Business integrity is the key point of the company policy, our management and staffs are fully aware of the rules and expectations of the DevCon with regard to integrity of our business dealings. Any contravention of our business principles or other rules of conduct can result in disciplinary action.

In all our activities, we pay respect to the letter and spirit of the relevant national and international legislations and regulations in place. DevCon does not give or receive bribes, either directly or indirectly or indulge in corrupt practices such as bribery, collusion, extortion and fraud or other improper rewards aimed at corporate or financial gain. It is not permitted for any of our employees to offer, give or accept gifts or payments, which constitute a bribe or could be regarded as immoral activities.



"Integrity is the basis for trust from our clients and trust within the Company"

Business Integrity Management System (BIMS)

The Business Integrity Management System consists of the following elements:

Business Principles

The Business Principles offer a framework of conduct for DevCon staff related to our clients, employees, partners and society.

Management Commitment

The management of the DevCon has made a commitment to adhere to the Business Principles and to conduct a dialogue with management and staff on ethical dilemmas encountered in the Business.

Dialogue

The responsibility for compliance to the Business Principles lies with the individual staff. Staffs is expected to discuss the issues or dilemmas, which they may face while performing the job, with their management considering the Business Principles as a reference.

Compliance

The observance of all rules intended to uphold the integrity of DevCon, its staff, all sector heads, supervisory director and the Managing Director is known as compliance.

Compliance promotes the adherence to internal and external regulations that serve to uphold the integrity of DevCon and its employees and other parties involved. This achieved by providing adequate regulations, increasing awareness, detecting infringements without delay, limiting the damaging consequences of non-compliance, encouraging action aimed at preventing damage in the future.

Compliance is concerned with the following specific matters:

- Business principles;
- Legislation / Legal aspects / Laws of the country;
- Code of conduct of service as per service rules;
- Rules of the donor agencies like World Bank, ADB, GoB and other concerned organization;
- Anti-money laundering and financing terrorism control (AML/CFT);
- Competition;
- Corruption / fraud;
- Grants schemes;
- Tax compliance;
- Corporate governance code;
- Conflict of Interest;
- Confidentiality and handling of sensitive information;
- Handling of incidents;
- Use of Internet & e-mails;
- Pre-Employment screening; and
- Violation of criminal laws, misinformation of any public body, violation of company's code of conduct, any misinformation, manipulation of information and failure to disclose about any detrimental quaked and situation to the higher authority in time;

Procedure

If any irregularity is suspected or observed, the normal procedure is for the staff member to report this to his/her own concerned superior officer. The superior officer will then record the detail and ensure that the matter is investigated and after investigation it will be informed to the Head of Administration or to the Managing Director or to a person nominated by the Managing Director with his comments for solution.



Business Principles

The Business Principles of the DevCon are defined by our position towards our main stakeholders and key values:

Clients

We give professional advice using an independent, critical approach. We protect our clients interest, avoid conflicts of interest and give open, honest advice to arrive at solutions. We also strive to meet the requirements of the end-users of our products and services.

Employees

We offer equal opportunities and stimulate the professional and personal development of our employees, taking individual wishes and circumstances into consideration. Recruitment, promotion and remuneration are performance related and measured against objective criteria. Employees are involved in consultations about policy, strategy and organizational structure. Once such consultations have been brought to a close, the employee must show unconditional commitment to the results or take the consequences. All DevCon employees are expected to avoid personal activities and financial

interests which could run counter to their responsibilities to the company. Furthermore, all DevCon employees are forbidden to strive for gain for themselves or others by exploiting their position.

Partners

Equality, reciprocity and reliability are our guiding principles. We refrain from dishonest and immoral competition and expect our partners to abide by codes of conduct comparable to our own. Agents and representatives are assessed on the basis of their reputation and compliance with the relevant policies and regulations of national governments. Agents and representatives are also required to uphold codes of conduct comparable to our own.

Shareholders / Board of Directors

Our aim is to achieve optimal business profits to allow healthy growth of our business. In accordance with the relevant rules and regulations we will provide complete, accurate and timely reporting with respect to financial and business developments to the shareholders / board of directors.

Society

It is our mission to provide services for the sustainable development of our living environment and in turn to the nation. We are directly involved with people and the local community within which we work, and stimulate this active role in our employees. Our work is guided by social, environmental and economic motives. We strive to ensure that our activities at present do not limit the possibilities for generations of the future.

Responsibility

DevCon Board of Directors is responsible for ensuring that all employees are familiar with the Business Principles, recognize their significance and adhere to them. Daily responsibility for this is delegated to the corporate management teams. Wherever necessary they shall ensure that local requirements are covered in detailed directives.

The Board of Director assesses compliance with the Business Principles, assisted by all sector Heads and supervisory directors. Employees are expected to report any infringement or suspicion thereof to the higher management. Reporting any form of (suspected) abuse shall not result in any disadvantage for the employee reporting the abuse.



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