

As an implementer responsible for optimising the use of HMG funding, Siren is committed to rigorous standards of delivery, accountability and compliance. Siren acknowledges the requirement to submit a Declaration of Compliance within 1 month of the Award of an Agreement, and annually thereafter. Siren will also maintain a Compliance Level Matrix, and ensure its availability for spot checks by the Authority. In order to ensure compliance with the HMG Supplier Code of Conduct, all Siren staff and members of the Siren supply and delivery chain will attend a mandatory workshop to review and sign the Siren Code of Conduct, and Siren's Project/Programme and Contract Management handbook (P/PCM Handbook). Our Code of Conduct mirrors the structure of the HMG Supplier Code of Conduct, addressing the key elements detailed below.

To ensure understanding of and adherence to the Code of Conduct, Siren developed a residential **pre-deployment training** course for technical experts. The course provides Siren consultants with an understanding of our principles, practices and context, Code of Conduct, conflict and gender sensitivity, safeguarding and whistleblowing.

Value for Money

The Siren Code of Conduct details our recognition that Value for Money (VfM) is an essential requirement. Our project and programme management structure, outlined in a P/PCM Handbook, ensures rigorous monitoring, evaluation and control for project delivery and budget expenditure. Siren's governance structure of Board of Directors, Contract Managers, Programme Managers and Project Managers lays out clearly defined authorities and responsibilities. Staff monitor performance and delivery compliance through weekly, monthly, quarterly and annual internal reporting and review to ensure accountability and responsibility for performance along the full delivery chain, both as a matter of routine, and in exceptional circumstances.

This structure enables Siren to maximise results, whilst driving cost efficiency throughout the project cycle, ensuring adherence to pricing structures that align payments to results and balancing risk. It also ensures the timely identification and resolution of issues and the sharing of lessons learned across the supply and delivery chain. Financial audits will be available to the Authority to enable scrutiny of VfM choices and records routinely maintained to third party audit standards for all expenditure. Siren's Code of Conduct includes sections on fraud, corruption, and due diligence for staff recruitment and selection of third party suppliers, to mitigate the risk of malpractice. Our transparent and open book approach ensures that budgeting and pricing is appropriate and that supply and delivery stakeholders are realistic about their capacity and capability, enabling project teams and suppliers to manage uncertainty and change, and to protect value in dynamic environments. Siren strives to reduce waste and improve efficiency in our supply chain and in our offices.

Ethical Behaviour

Siren shares HMG's commitment to **safeguarding**¹, and notes the recent amendments to the Framework Agreement relating to safeguarding. Our Code of Conduct lays out our safeguarding policies, including a commitment to provide a safe and trusted environment, an organizational culture that prioritises safeguarding, and a clear process for how incidents and allegations of sexual exploitation, abuse and harassment will be handled should they arise.

Recognising that our staff and subcontractors act on behalf of HMG, Siren's Code of Conduct and governance structure ensures that interactions with all stakeholders meet the highest ethical standards. Siren is committed to supply and delivery arrangements and relationships free from bias, conflict of interest or undue influence. We ensure that all staff are free from undue influence, and that suppliers and subcontractors do not attempt to influence the Authority. Siren's Code of Conduct ensures the integrity of Authority monitoring and management. We comply with HMG's Business Appointment Rules, and can provide evidence of compliance. Siren's recruitment policy ensures the mitigation and management of conflicts of interest through due

¹ Note to CSSF Suppliers, 'Safeguarding Policies and Procedures', 26 February 2018

diligence, interest registers and recusals. Siren's induction workshop for staff includes ethical training covering human rights, modern day slavery, and gender sensitivity, with annual refresher training. Our whistleblower policy ensures that staff are able to report aid diversion, fraud, money laundering or counter-terrorism finance independently to FCO's Anti Fraud and Corruption unit.

Transparency and Delivery Chain Management

Siren has a robust supply and delivery chain management structure to ensure full transparency and adherence by all delivery chain partners to HMG standards, including the HMG Suppliers Code of Conduct. Our procurement manual² and our Code of Conduct, define Siren's engagement with suppliers by zero tolerance on tax evasion, corruption, bribery, and fraud in service delivery. Siren supports project delivery that fosters economic growth in developing countries, including the use of Medium and Small Enterprises (MSMEs). We are a signatory to HMG's recommended prompt payment code. We uphold human rights standards, including the prevention of modern day slavery. We maintain up to date records of all downstream partners receiving HMG funds and will map how funds flow from suppliers to beneficiaries, identifying and mitigating risks. We will ensure delivery chain employees are aware of FCO AFCU, and publish data in accordance with IATI. We do not use restrictive exclusivity agreements with sub-partners.

Environmental Issues

Siren is committed to high environmental standards encouraging positive behaviour change. Through its internal Environmental Policy, Siren will identify risks, take steps to protect the local environment and track and publish regular environmental performance reports. Siren already implements recycling and has installed low-energy light bulbs in all offices. Siren adheres to national environmental protection legislation.

Terrorism and Security

Siren implements due diligence along its entire supply, delivery and outcome chain to ensure HMG funding is not linked to terrorist offences, activities or financing. Siren safeguards the integrity of its IT and mobile communications through the use of firewalls, secure software settings, password protection, access-controlled databases, virus and malware protection, and updating software. Siren is currently preparing for certification, through HMG's Cyber Essentials Scheme, to achieve a Cyber Essentials Plus rating.³

When integrating digital elements, Siren adheres to the Global **Principles for Digital Development**. In Lebanon, Siren developed Fenix™, a custom-built software that captures police workflows, supporting data analysis within the Internal Security Forces (ISF). In developing the software, we led with the principle of 'design with the user', working closely with the ISF to design, test and improve the software.

Social Responsibility and Human Rights

Siren is a signatory of the UN Global Compact⁴ and our Code of Conduct serves to cascade the principles enshrined in the Global Compact down to staff levels. It demonstrates a practical commitment to ensure safe and healthy working conditions, freedom of association, non-discrimination in personnel practices, guarding against use of forced or child labour, providing access to basic health, education, and housing for workers if not provided elsewhere, ensuring affirmative action to hire victims of domestic violence, and accommodating employees' religious observance and practices. The Siren Code of Conduct also outlines practices in line with ILO 138 and Ethical Trading Initiative Base Code, policies that embed best practice for UNGC Principles 1 and 2. Siren will provide HMG with a Statement of Compliance on developing local markets and institutions and one on social inclusion and environmental responsibility and will ensure that transparent consideration is given to local capacity building and stakeholder inclusion.

² www.sirenassociates.com/procurement_manual.pdf

³ www.cyberessentials.ncsc.gov.uk/getting-certified/

⁴ www.unglobalcompact.org/what-is-gc/participants/132132-Siren-Associates