

Code of Conduct Policy

Version: 1.0

Effective Date: 19/03/2019

Approved By: Management

1. Purpose

Innovation Ltd is committed to conducting business ethically, lawfully, and with integrity. This policy establishes the minimum standards for preventing money laundering, bribery, corruption, fraud, and unethical conduct by employees, directors, contractors, and consultants acting on behalf of the company.

2. Scope

This policy applies to all personnel, contractors, temporary staff, and any third party representing Innovation Ltd.

3. Anti-Money Laundering (AML)

Although Innovation Ltd is a consultancy and is not a regulated financial institution, the company will take reasonable measures to prevent its services from being used for money laundering or other financial crime.

Innovation Ltd will:

- Understand the nature and purpose of client relationships.
- Decline work where the client's identity, ownership, or source of funds raises significant concerns.
- Avoid accepting cash payments except where expressly approved by management.
- Maintain accurate records of contracts, invoices, and payments.
- Report suspicious activity internally to management for assessment and appropriate action.

4. Anti-Bribery and Corruption (ABC)

Innovation Ltd maintains a zero-tolerance approach to bribery and corruption.

Employees and representatives must not:

- Offer, promise, request, authorize, or accept bribes or improper advantages.
- Make facilitation payments or unofficial payments to obtain business benefits.
- Use third parties to perform actions that would violate this policy.

Business decisions must be based solely on merit, quality, and legitimate commercial considerations.

5. Gifts and Hospitality

Reasonable business gifts and hospitality may be accepted or provided where they:

- Are lawful.
- Are modest in value.
- Are infrequent.
- Cannot reasonably be viewed as influencing a business decision.
- Cash or cash-equivalent gifts must never be offered or accepted.
- When in doubt, employees should seek management approval.

6. Conflicts of Interest

Personnel must avoid situations where personal interests conflict, or appear to conflict, with the interests of Innovation Ltd or its clients.

Any actual, potential, or perceived conflict must be disclosed promptly to management.

7. Code of Conduct

All personnel are expected to:

- Act honestly and professionally.
- Treat clients, colleagues, and partners with respect.
- Comply with applicable laws and regulations.
- Protect confidential and proprietary information.
- Avoid discrimination, harassment, and abusive conduct.
- Protect company assets and information systems.
- Maintain accurate business and financial records.

8. Third Parties

Innovation Ltd seeks to work only with reputable clients, suppliers, and business partners.

9. Reporting Concerns

Anyone who becomes aware of suspected fraud, bribery, corruption, money laundering, or other misconduct should report the matter immediately to management.

Reports will be handled confidentially to the extent reasonably possible. Retaliation against anyone raising a genuine concern in good faith is prohibited.

10. Record Keeping

Innovation Ltd will maintain appropriate records of:

- Client engagements.
- Contracts.
- Invoices and payments.
- Reported compliance concerns and their resolution.

Records should be retained in accordance with applicable legal and business requirements.

11. Responsibilities

Management is responsible for:

- Promoting an ethical culture.
- Implementing this policy.
- Reviewing reported concerns.
- Ensuring appropriate corrective action where necessary.

All personnel are responsible for understanding and complying with this policy.

12. Non-Compliance

Violations of this policy may result in disciplinary action, termination of engagement or employment, and, where appropriate, referral to relevant authorities.

13. Review

This policy will be reviewed periodically and updated as necessary to reflect changes in legal requirements or business operations.

Policy Statement

Innovation Ltd is committed to conducting all business with integrity, transparency, professionalism, and respect for the law. Every individual representing the company shares responsibility for maintaining these standards and protecting the company's reputation.