



# THE BLACK DOG BUSINESS PRINCIPLES & VALUES

## ABSTRACT

Reputation and quality can only be maintained with a vision of how to do business that affects all aspects of administration and operations. Each employee must be able to access, understand and buy into the corporate philosophy. In this way, whether together or individually, employees have a framework within which to operate and make decisions autonomously. Customers and suppliers should also expect the company to operate in a predictable, ethical and responsible way.

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# THE BLACK DOG BUSINESS PRINCIPLES & VALUES

Delivering Quality Technical Services

## Introduction

Black Dog Communications (BDC) is part of the Black Dog Group of international companies that provide managed technical services which in turn are designed to be technical and program multipliers for client companies. Black Dog specializes in delivering services, especially telecommunications projects, in non-permissive environments.

The Black Dog Group is registered in the US, with offices in Rochester NY, and in the UK, with an office in Poole Dorset, to enable it to provide a range of capabilities and attract a truly international range of consultants and clients.

## Black Dog Business Culture

Black Dog aims to conduct business around a philosophy that encompasses an ethos of quality which underpins every aspect of our operations. This philosophy is set out in the following policies which are broadly benchmarked to leading defence contractor companies.

1. **Core Values** – Describes the values that constitute the Black Dog culture
2. **Responsible Trading Principles** – The standards that we commit to while working with clients and consultants
3. **Anti-Corruption Policy** – Our attitude to the actual and perceived threat of corruptive practices
4. **Code of Conduct** – The code by which the Company and its individuals conduct themselves



5. **Drug & Alcohol Policy** – The lawful, ethical, safe working practices and attitudes surrounding substance use and operating in high profile/risk areas
6. **Background Check Policy** – The BDC policy on employee checks, their use and standards

## Core Values

The values around which Black Dog was originally conceived to operate are simple and aimed at influencing corporate and individual behaviour.

- **Loyal** – A trusted long term partner. We deliver on our commitments to clients and consultants. We must be honest and take responsibility so that we can be relied upon. In our organisation, everyone’s contribution matters.
- **Hard Working** – Focused to see the achievement of the clients’ aims and objectives through to a successful resolution. We constructively challenge and take the initiative, operating with tenacity and resolve. We accept challenges and manage risk and set ourselves stretching goals.
- **Personable** – Easy to work and communicate with. We deliver leading-edge services and solutions by valuing the imagination and experience within our organization and empowering teams and individuals to work together across the company and with the client and customer for the benefit of our organization and the goals of our clients.
- **WYSIWYG** – Honest and plain speaking; ‘what you see is what you get’. In all our written and verbal communication it makes sense that consultants, clients, their customers and other stakeholders understand exactly what we mean and what expectations are set.
- **Pedigree** – Assured quality with experience and history. We commit to a level of quality in product and personnel which sustains the expectation we set in our client’s view of Black Dog services.



## Responsible Trading Principles

Our ‘Responsible Trading Principles’ are designed to help make informed decisions about the business opportunities BDC pursues and help employees apply these values in their decision-making.

<p>1. The Company understands and supports our customers’ national security considerations and other requirements especially the transfer of technical information and data</p>	<p>Earning the trust of our customers is critical to the success of our business. They must trust us to understand their particular circumstances and respond to their requirements including how we can best meet their need to control and deliver restricted ITAR services, information and data.</p>
<p>2. The Company and Individuals work to Black Dog Core Values in all that we do</p>	<p>Together with our Code of Conduct, our Values guide employees in their business decisions:</p> <p><b>Loyal</b> – A trusted long term partner.</p> <p><b>Hard Working</b> – Focused to see the achievement of the clients’ aims and objectives.</p> <p><b>Personable</b> – Easy to work and communicate with.</p> <p><b>WYSIWYG</b> – Honest and plain speaking; ‘what you see is what you get’.</p> <p><b>Pedigree</b> – Assured quality with experience and history</p>
<p>3. We assess our services with the objective that neither BDC nor our customers are exposed to significant reputational risk</p>	<p>The Code of Conduct together with our Anti-Corruption Policy sets out how we manage potential reputational risks associated with the delivery of services and the association and relationships with other agencies, companies, NGO’s and government departments that would reflect on Black Dog, our Client’s and their customers</p>



4. The Company is as open as practicable about the nature of our business

Being transparent about what we do and how we do it helps us build trust among our stakeholders. We aim to communicate openly and transparently with stakeholders on our business activities within the limits of the confidentiality and non-disclosure agreements with our customers.

## **Anti-Corruption Policy**

### **Bribery and Facilitating Payments**

Black Dog Group of companies, employees and consultants will not offer, give or receive bribes or inducements for any purpose whether directly or through a third party.

Even the suggestion of corruption may damage the reputation of the Company and/or the client and affect their ability to do business. It may also bring the personal integrity of individuals into question. Employees, advisers, consultants or anyone else who may be acting on the Company's behalf will not offer, give or receive bribes or corrupt payments. A bribe includes any payment, benefit or gift offered, given or received with the purpose of improperly influencing a decision or outcome. We will not offer, give or receive any payment, benefit or gift which is intended or may be construed as a bribe.

### **Kick-Backs**

Neither Black Dog Communications, nor anyone acting on behalf of Black Dog Communications, may offer or accept a "kick-back" of any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.



A “kickback” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.



## **Gifts, Hospitality and Entertainment**

Black Dog Communications, and anyone acting on behalf of Black Dog Communications, shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.

## **Extortion**

Black Dog Communications, and anyone acting on behalf of Black Dog Communications, shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

## **Conflicts of Interest**

Black Dog Communications, and anyone acting on behalf of Black Dog Communications, shall avoid any relationship or activity that might impair, or appear to impair, the ability to render objective and appropriate business decisions in the performance of our jobs.

## **Political Contributions**

Neither Black Dog Communications, nor anyone acting on behalf of Black Dog Communications, may make a political contribution in order to obtain an unlawful business advantage. Black Dog Communications shall comply with all public disclosure requirements.

## **Philanthropic Contributions**

Black Dog Communications, and anyone acting on behalf of Black Dog Communications, may make contributions only for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.







## Code of Conduct

**The Company:** commits that its leaders, managers and supervisors will:

- Act with integrity, serving as role models for the high standards of conduct expected throughout the Company
- Promote ethical conduct, both within the Company and in the countries in which we operate
- Provide training and other resources so that employees are equipped to deal with ethical issues
- Make sure this Code is provided to, explained to and understood by employees they manage and supervise
- Foster an open work environment in which employees are encouraged to raise questions or concerns without fear of retaliation or retribution
- Take action to address concerns of ethical misconduct

**Individuals:** collectively as teams and as a Company, Black Dog personnel will always:

- Foster a culture of ethical behaviour
- Take personal responsibility for implementing the standards in this Code and comply with all Company policies and processes
- Comply with applicable laws and regulations and contract requirements as a minimum. In the many instances where we set our own higher standards, we will apply these first
- Respect the human rights of our employees in the workplace and the communities in which we operate
- Seek guidance where we are unsure of the appropriate course of action



## Statement

### Reporting Requirement

All officers and employees of Black Dog Communications and anyone acting on behalf of Black Dog Communications shall promptly report any actual or potential violation of this Code of Conduct, including any instance in which he/she is subjected to any form of extortion or is asked to participate in any way in a bribery scheme, to Black Dog Communications senior corporate management, without fear that his/her business relationship or employment will be adversely affected. Reports shall be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

### Company Responsibility

No employee will suffer demotion, penalty or other adverse consequences for not paying bribes even when Black Dog Communications may lose business as a result of the employee's refusal to do so. Employees are required to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

Black Dog Communications shall, where appropriate, sanction employees, suppliers or other business partners for violations of this Code of Conduct.



## Drug & Alcohol Policy

Individuals may be drug screened as part of the employment hiring process. New employees may be tested before or after interviews and during new hire orientation. Employees should expect to be drug and/or alcohol tested prior to accepting a promotion, when an on-the-job accident occurs, or at any other time as deemed necessary by the BDC management team. Submission to scheduled and random drug testing is a continuing condition of employment for all personnel. Any applicant or employee who tests positive for illegal drug use will not be hired or promoted, may be subject to disciplinary action and required to participate in substance abuse counselling, and may be terminated from employment.

### Types of Employee Drug Testing

- **Pre-Employment Drug Testing:** All applicants who are offered a job with the company will be tested for drugs as part of the post job offer employment screening process.
- **Random Drug Testing:** Employees may be selected at random for drug testing at any time. These tests are unannounced and unexpected by employees. The random selection process creates an equal chance for all employees to be picked for testing. Random drug testing has little to no advanced notice, which is an effective deterrent to employee drug use.
- **For Cause Drug Tests:** Employees may be required to submit to a drug test if the company believes they have been under the influence of drugs or alcohol on the job, if unexcused absence from work or lateness is an issue, or if performance appears to be impacted by drug or alcohol abuse. For cause drug testing is not just to test for drug use on the job, but also determines use during off-work hours and/or at home.
- **Post-Accident Drug Test:** Any employee involved in an on-the-job accident or injury may be tested for drug or alcohol use. These accidents can include driver negligence, a workplace injury with medical treatment on or away from the scene, disabling damage, or car removal.



## Refusing an Employment-based Drug Test

Refusing to submit to testing may result in a rescinded offer of employment. Current employees can also be terminated, demoted, or suspended for refusing a drug test.

## Background Check Policy

The BDC employee background check policy refers to our guidelines for investigating job candidates' backgrounds as part of our hiring process. Background checks help us:

- Get insight into candidates' background.
- Ensure we hire reliable employees.
- Verify candidates' information for truthfulness and accuracy.
- Screen candidates convicted of serious criminal behavior.

This employee background check policy applies to candidates who go through our company's hiring process. It may also apply to internal candidates who are being considered for a promotion or transfer.

Background checks may include:

- Criminal records.
- Credit reports.
- Drug testing (see specific Drug Policy).
- Verification reports (e.g. identity, previous employment, education, SSN)
- Driving records.
- Reference checks.

All candidates aren't required to pass every type of background check we offer before BDC hires them. Each position has its own requirements and sometimes clients may require certain checks and standards in order to represent them. The basic background screening includes verification reports and reference checks.



Local laws may prohibit or restrict certain types of background checks. We'll comply with legal guidelines at all times.

Criminal record checks are essential for positions where candidates will:

- Represent BDC, or client company, and deal with our/their clients or stakeholders.
- Have access to sensitive and confidential information
- Handle money and finances

### **TIP - Trafficking in Persons Policy**

Black Dog Communications (“BDC”) has a robust compliance and ethics program aligned with our corporate values, particularly our dedication to enabling children to achieve their full potential and ensuring their overall well-being in a protective and conducive environment. At inception in October 2014, BDC formally adopted a zero tolerance policy regarding trafficking in persons (TIP). BDC’s leadership understands the importance of counter-trafficking initiatives and have devoted sufficient resources to ensure compliance. The policy is directed by Federal Acquisition Regulations.

In summary, the policy prohibits individuals from:

- Engaging in trafficking in persons
- Procuring commercial sex acts
- Using forced labor in the performance of the award
- Directly supporting or advancing trafficking in persons

BDC’s TIP policy does not distinguish between severe and non-severe forms of TIP activities, and therefore its employees are held to the highest standard of not engaging in or supporting any form of trafficking.

BDC’s compliance BDC consists of four pillars:

1. Awareness



2. Prevention
3. Recognition
4. Reporting

### **Applicability**

BDC's TIP policy applies to all employees, including direct employees, consultants, and volunteers. It also applies to sub-awardees. Where applicable, BDC includes the relevant FAR/Standard Provision clauses in all subcontracts/sub-agreements with sub-awardees and recruiting agents.

BDC will share the responsibility of:

1. Ensuring that countertrafficking policies are known to third parties,
2. Vetting third parties
3. Obtaining certifications from third parties at the proposal stage. Third parties include suppliers, sub-awardees, and recruiting agents.

### **Responsibility to Keep Children Safe**

As one in four trafficking victims are children, BDC believes that in a world where children face so many threats of harm, it is our duty to ensure that we, as an organization, do not contribute in any way to harming or placing children at risk. BDC strives to create a professional culture where all employees are aware of issues that specifically face children in the countries where we work, affirmatively prevent harm and protect children, and report concerns so that BDC management may effectively respond.

### **Trafficking in Persons Compliance Plan**

**Awareness** – All BDC employees will be required to sign-up to the policy and promote awareness of trafficking activities. As a result of the on-boarding process and understanding the policy, employees and contractors will be able to define trafficking in persons, identify where TIP occurs around the globe, understand the legal framework governing TIP, state what USG clients expect from BDC employees to combat TIP, explain BDC's TIP compliance policy, and know the steps to prevent, recognize, and report trafficking activities.



BDC will also formally observe UN World Day Against Trafficking in Persons (July 30) and U.S. National Human Trafficking Awareness Day (January 11).

**Prevention** – The BDC management team will keep abreast of local labor law and ensure compliance therewith in countries in which we operate.

Sub-awardees, partners, and suppliers will be required to acknowledge having received a copy of the policy and an agreement not to engage in TIP activities.

BDC already has several standards and controls in place to ensure compliance with the TIP policy, including the Ethics Code of Conduct. The BDC management has recruitment policies that prohibit the use of any fraudulent or misleading recruitment practices. BDC does not charge recruitment fees to any candidate. Job advertisements posted in the U.S. and abroad for USG-funded projects include language to the effect of “BDC does not charge recruitment fees to applicants.” Employees hired are paid per established salary ranges that meet or exceed local labor law. All employees are presented a written employment contract in the official language of that country. When BDC hires a third-country national (TCN) or U.S. expatriate to work on a task, they are provided round-trip transportation costs.

As a general rule, BDC does not provide housing to employees. Should this be required, BDC will ensure that any housing meets host country safety standards.

**Recognition** – BDC is committed to working only with sub-recipients and vendors that adopt a zero tolerance policy when it comes to Trafficking in Persons.

**Reporting** – It is a priority of BDC that it and its employees act ethically and legally. It is therefore very important that any illegal activity or violations of the Trafficking in Persons Policy be promptly brought to the organization’s attention. All BDC employees, sub-recipient employees, and suppliers are required to report suspected trafficking-related activity to BDC.





Reporting may be made in one of several ways:

1. Any supervisor in his/her reporting line
2. A member of the Executive Team
3. The CEO
4. SafeCall, by phone at 1-866-901-3295, online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report), or email at [BDC@safecall.co.uk](mailto:BDC@safecall.co.uk) (Refer to the Whistleblower Policy for details on how reports are handled by Safecall)
5. Global Trafficking hotline 1-844-BE-FREE

An employee who has any questions regarding this Code or its application to a particular situation should discuss these concerns with any of the persons listed above. BDC employees may report illegal acts or a violation of this policy anonymously. However, anonymous reports must contain enough detailed information to permit the organization to investigate.

It is BDC's policy to promptly and appropriately investigate reports of illegal activity or violations of the Trafficking in Persons Policy. BDC employees must cooperate with these investigations. It is a violation of this policy for BDC employees to prevent, hinder, or delay discovery and full investigation of illegal acts or violations of this Code. To the extent practicable under the circumstances, BDC will take reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or violations of this Code and of those individuals involved in the alleged improper activity, whether or not it turns out that improper acts occurred.

No reprisals or disciplinary action will be taken or permitted against employees for good faith reporting of, or cooperating in the investigation of, illegal acts or violations of this policy. It is a violation of this policy for any BDC employee to punish or conduct reprisals against another employee for making a good faith report of, or cooperating in the investigation of, illegal acts or violations of the TIP Policy. Employees who violate the policy or commit illegal acts are subject to disciplinary action up to and including termination. Employees who report their



own illegal acts or improper conduct, however, will have such self-reporting taken into account in determining the appropriate disciplinary action.

## **References**

- Black Dog Communications (BDC) Trafficking in Persons Policy
- Standard Provision M20 (April 2016)
- FAR 52.222-50 – Combatting Trafficking in Persons (March 2015)
- FAR 52.222-56 – Certification Regarding Trafficking in Persons Compliance BDC (March 2015)