Diyokes Consultants Limited

Integrity Compliance Programme (ICP)

Upholding Integrity, Ethics, Transparency, and Professional Excellence in Consulting Engineering

Message from the Managing Director

- **Core Commitment:** DCL is dedicated to the highest standards of integrity, ethics, and applicable laws in all business dealings.
- **Business Imperative:** Integrity is a "cornerstone" of DCL's values and a business necessity to maintain a competitive edge and the trust of Multilateral Development Banks (MDBs).
- **Zero Tolerance:** DCL maintains a strict policy against fraud, corruption and unethical behavior.

Message from the Managing Director

- **Leadership Oversight:** The Board of Directors and the MD personally oversee the ICP to ensure business is conducted with total integrity.
- **Stakeholder Expectation:** Full compliance is expected from all staff, JV partners, sub-consultants, and third parties.
- **Safety & Accountability:** DCL guarantees that all reports of misconduct will be investigated promptly and that whistleblowers will be protected from retaliation.

Introduction & Strategic Goals

- **The ICP System:** A comprehensive framework designed to prevent, detect, investigate and remediate defined misconduct (fraud, corruption, collusion, coercion, and obstruction).
- **Developmental Goal:** Reducing the risk of fraud and corruption in infrastructure projects, particularly those financed by multi-lateral agencies.
- **Legal Alignment:** The program ensures DCL stays in full compliance with relevant laws and MDB regulations.

Introduction & Strategic Goals

- **Risk Mitigation:** Encouraging project staff awareness regarding the real-life repercussions of misconduct, especially in fragile or conflict-affected regions.
- **Key Appointments:**
  - **Compliance Officer (CO):** Responsible for developing training and communication programmes, and consultation.
  - **Investigative Team:** A three-person team (led by an external auditor or legal counsel) handles formal violations.

Corporate Culture & Core Values

- **The Enabling Environment:** A culture of ethics provides the "ethical compass" and motivation for the entire anti-corruption program.
- **Tone from the Top:** Leadership carries the commitment through strong visible behavior, statements, and active support.
- **Alignment:** DCL's anti-bribery policies are a direct expression of its core corporate values.



Corporate Culture & Core Values

- **Speak-Up Culture:** Employees are encouraged to report concerns through confidential and anonymous channels.
- **Incentives & Discipline: * Rewards:** Ethical behavior and "speaking up" are visibly rewarded.
  - **Penalties:** Misconduct is visibly penalized; remuneration is designed not to inadvertently reward unethical behavior.



Scope of the ICP

- **Exceeding Legal Minimums:** Staff and consultants are expected to be role models, holding themselves to ethical standards that go well beyond basic legal requirements.
- **Personal Accountability:** Every individual, regardless of rank, is accountable for complying with the ICP, all DCL policies and applicable laws.
- **Annual Review:** Every person must review the ICP at least once a year and sign an acknowledgment of understanding and agreement.

Scope of the ICP

- **Duty to Disclose:** Employees have a formal responsibility to state any situations that might violate the law or ICP.
- **Consequences of Violation:** Violations jeopardize the firm's ability to work with the World Bank and MDBs, and will lead to strict disciplinary action, including termination of appointment.



WBG DEFINITION OF MISCONDUCT

- Misconduct:

(i) fraudulent, corrupt, collusive, coercive, and obstructive practices, and

(ii) any other type of misconduct

Prohibition of Misconduct

- We must all act with integrity, honesty and transparency at all times and in all situations.
- Any and all fraudulent, corrupt, collusive, coercive, and obstructive practices, as well as conflicts of interest are prohibited at DCL.

Prohibition of Misconduct

- **Corruption:** Offering, giving, receiving, or soliciting anything of value to improperly influence the actions of another party.
- **Fraud:** Any act or omission, including misrepresentation, intended to mislead a party for financial benefit or to avoid an obligation.
- **Collusion:** Arrangements between two or more parties designed to achieve an improper purpose or influence actions.



Prohibition of Misconduct

- **Coercion:** Impairing or harming (or threatening to harm) any party or their property to improperly influence actions.
- **Obstruction:** Deliberately destroying, falsifying, or concealing evidence, or making false statements to impede an investigation.

Reporting Obligations

- **The Duty to Report:** Every employee, manager, and consultant has a primary responsibility to promptly report any known or suspected misconduct.
- **Third-Party Inclusion:** This obligation extends to JV partners and sub-consultants.
- **Internal Reporting Line:** Concerns should be reported to direct managers, the Compliance Officer, or the MD.



Reporting Obligations

- **Managerial Duty:** Any manager receiving a report or suspecting fraud must immediately report it to the MD.
- **False Allegations:** Knowingly making false or malicious allegations is itself a form of misconduct subject to discipline.
- **Reporting Awareness:** DCL provides periodic reminders on reporting channels and the duty to use them.



Whistleblower Protection

- **Zero-Tolerance for Retaliation:** DCL strictly prohibits any adverse employment action against those who report in good faith.
- **Protective Protocols:** Retaliation is subject to termination; actual or potential retaliation should be reported immediately to the CO or MD.
- **Good Faith Standard:** No employee will suffer for bringing forward allegations they believe to be true.

Anonymity and Confidentiality

- **Anonymity:** Staff may choose not to provide their name at all.
- **Confidentiality:** Names provided will not be revealed outside the investigative team unless the staff member consents, or if ordered by a Nigerian court.
- **Commitment:** DCL ensures reports are reviewed fairly, thoroughly, and impartially while protecting the reporter's identity.

Reporting Channels and Protocols

- **Available Channels:**
  - Dedicated Email: integrity@diyokes.com.
  - Dedicated Telephone Line: 08109775919
  - Physical Drop Boxes (in offices/conference rooms).
- **Language:** Reports should be submitted in English.

What to Include in a Report

- **Key Details:** Project name, contract reference number, and a chronological description of events.
- **Involved Parties:** Names, positions, and affiliations of those suspected (employees, officials, or contractors).
- **Evidence:** Specific dates, locations, amounts involved, and any supporting documents or emails.
- **Follow-up:** Anonymous reporters are encouraged to provide at least an email address for clarification.

Investigation Protocols

- **Triggering Events:** Investigations are sparked by reports of bribery, fraud, collusion, conflicts of interest, or false claims in proposals.
- **Administrative Standard:** Investigations are administrative, not criminal. The standard of proof is the "balance of probabilities" (more likely than not).
- **Inquiry Results:** Cases are deemed "substantiated" (evidence found), "unsubstantiated" (insufficient evidence), or "unfounded" (no basis in fact).

Investigation Protocols

- **Responsibility:** Led by the CO or a three-man team (including the external auditor/legal counsel, ethics officer, and a manager).
- **Timelines:** DCL aims to resolve simple cases within 8 weeks and complex cases within 18 weeks or more.
- **Record Keeping:** Every stage of the investigation must be thoroughly documented.



The Rights of the Accused

- **Right to Respond:** A staff member has the right to respond to allegations orally and/or in writing.
- **Response Time:** At least 5 business days are provided for written responses.
- **Support:** Accused members may be accompanied to interviews by a staff member not connected to the case.
- **Final Review:** The accused receives a copy of the investigative report to comment on findings before a decision is made.

Decision-Making and Notification

- **Final Authority:** The MD makes the final determination on misconduct and sanctions based on the team's recommendation.
- **Notification:** Staff members are notified in writing of the decision, the reasons for sanctions, and their right to appeal.
- **Administrative Leave:** During an investigation, a staff member may be placed on administrative leave if their presence poses a risk to the inquiry.

Disciplinary and Remedial Measures

- **Range of Sanctions:** Includes written warnings, suspension without pay, demotion, or termination.
- **Remediation:** DCL goes beyond discipline to implement "Remediation Plans" that fix systemic issues identified during the investigation.
- **Sanctions Against Individuals:** If misconduct is confirmed, appropriate sanctions will be applied to the individuals involved.



Selection of Key Personnel

- **Phase 1 (Requirements):** Detailed identification of qualifications, technical expertise (e.g., HEC RAS, GeoStudio), and communication skills.
- **Phase 2 (Sourcing):**
  - **Internal:** Reviewing existing staff and applicant databases.
  - **External:** Advertising via the ACEN Forum, NSE platforms, and professional networks.



Selection of Key Personnel

- **Phase 3 (Assessment):** Technical interviews chaired by the MD and panel; reference checks to verify performance and ethical conduct.
- **Phase 4 (Commitment):** Successful candidates must sign a formal "Letter of Commitment as to Availability" and acknowledge the DCL ICP.
- **Integrity Screening:** All new employees are screened for past compliance violations through references and public data.

Contractual Integrity Mandates

- **Pre-Contract Certifications:** Key experts must sign statements confirming their availability and their understanding of the ICP principles.
- **Contract Terms:** Individual agreements explicitly reference the ICP as an integral part of the contract.
- **Mandatory Disclosure:** By signing, consultants agree to disclose conflicts of interest and report any suspected misconduct.



Project Initiation and Training

- **Mobilization:** Teams are mobilized at the head office in week 1 and at the project site in week 2.
- **Integrity Workshop:** A two-day training session acquaints staff with the project objectives, MDB requirements, and DCL's ICP.
- **Procedure Manuals:** Site staff are trained on supervision procedures and recording formats to ensure accurate reporting.

Changing Key Personnel

- **General Rule:** No changes should be made between proposal submission and contract award.
- **Exceptions:** Changes are only allowed for death, illness, or resignation beyond DCL's control.
- **Protocol:** DCL must submit a written request to the Employer with supporting evidence (e.g., medical certificates) and a CV for a replacement of equal or higher qualification.



Management Roles & Oversight

- **Active Supervision:** Managers must guide their teams on ICP compliance and discuss integrity during annual performance reviews.
- **The Integrity Function:** The CO implementation team monitors the program's effectiveness and provides expert advice to staff.
- **Training Frequency:** Integrity training certifications must be completed at least annually.

Business Partner Due Diligence

- **Vetting Process:** Prospective JV partners and sub-consultants must undergo thorough due diligence, including questionnaires.
- **Contractual Obligation:** Partners are legally required to comply with the ICP and cooperate with audits.
- **Remuneration Controls:** Payments are monitored to ensure they are for legitimate services and not used for improper purposes.



Gifts, Hospitality, and Entertainment

- **Gift Register:** DCL maintains a formal register for all gifts, documenting value, purpose, and whether the gift was approved or declined.
- **Prohibited Items:** Cash, extravagant gifts, or any gift offered to World Bank/MDB staff are strictly forbidden.
- **Doubts:** When in doubt, employees must report the offer to the Compliance Officer for a determination.

Field Supervision & Quality Control

- **Accurate Site Records:** Site diaries, progress reports, and material test checklists must reflect the absolute truth of work done.
- **Joint Measurement:** Valuation of contractor work is done jointly using standard methods (e.g., ICE 3rd Edition) to prevent over-invoicing.
- **Facilitation Payments:** Strictly prohibited, except in "exigent circumstances" (threat to life), which must be reported immediately.

Document Retention and Conclusion

- **Audit Trail:** DCL maintains detailed records of all compliance activities, training, and investigations.
- **Retention Period:** Records must be kept for the duration required by MDB contracts and applicable laws.
- **Final Vision:** By upholding this ICP, DCL ensures its legacy of trust and its role in sustainable national infrastructure development.



THANK YOU FOR LISTENING

