



Anti-Bribery  
and Corruption  
Prevention  
Procedure

Jun

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Revision 2

## Anti-Bribery and Corruption Procedure

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### 1. Purpose

This document sets out the rules and mandatory practices for Personnel to follow related to the aspects of Bribery and Corruption and to ensure that Personnel are aware and comply with anti-bribery and corruption laws in the jurisdictions Abraj Energy Service operates.

The nature and scale of the sector Abraj operate in, and the complexity of the working and contractual relationships with governments, joint venture partners, suppliers and other contractors, require significant management. With ever changing regulatory landscape and heightened transparency requirements, compliance with anti-bribery and anti-corruption has become a key business priority. Our core values at Abraj drive us to conduct business professionally with the highest integrity and compliance with national and international laws.

Should you require further support, please contact any member of the Compliance Committee or send an E-mail to [Quality.Compliance@abrajenergy.com](mailto:Quality.Compliance@abrajenergy.com).

### 2. Scope

The scope of an Anti-Bribery & Corruption procedure is to set up processes and rules within a company to stop, catch, and deal with corruption and bribery. To ensure ethical behavior, legal compliance, and the protection of the organization's reputation, it involves educating personnel, performing due diligence on business partners, creating anti-bribery rules, monitoring compliance, and taking corrective action.

### 3. Definitions

- **Advantage** The summary of Entertainment, Gifts and Hospitality.
- **Bribery** is the acceptance of, the promise to give, or the giving of any Advantage, whether directly or through intermediaries, to someone holding a public office or to someone in business with the intention to obtain an unlawful benefit in return for the bribe.
- **Conflict of Interest** exist when an individual or corporation has the opportunity – real or perceived – to exploit their position for personal or corporate benefit. Corruption occurs when the individual or corporation takes advantage of that opportunity and indeed abuses their position for private gain.
- **Corruption** is the misuse of entrusted power (such as politicians and government officials) for private benefit. Corruption is not only limited to bribery but can also include embezzlement, abuse of power, fraud, deception, nepotism, and collusion.
- **Due Diligence** A series of steps taken to investigate information relating to a Third Party's identity, connections, risk profile and ethical behavior prior to entering in business agreement or contract with a third party.
- **Entertainment** The attendance at social, cultural or sporting events.
- **Facilitation Payments** are small payment requested by a public official in order to enable or speed up a process that is his or her duty, such as issuing permits, licenses, or other official documents, processing governmental papers, such as visas and work orders, providing police protection, mail pick-up and delivery, providing utility services and handling cargo.
- **Gift** is anything of value, including - but not limited to - meal vouchers, loans, cash, favorable terms or discounts on any product or service, services, equipment, prizes, products, transportation, use of vehicles, vacation or other facilities, stocks or other securities, home improvements, tickets, gift certificates, gift cards, discount cards, memberships and employment or consulting relationships.
- **Hospitality** meals, drinks, as well as lodging and travel expenses.
- **PEP**: Politically Exposed Person.
- **Personnel** is any employee, officer and executive staff employed with or appointed to Abraj, as well as any agent or person working under contract that occupies a permanent or temporary position within Abraj, such as seconded staff or staff sourced from manpower contractors.

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- **Public official** is anyone in a position of official authority that is conferred by a state, or holds a legislative, administrative, or judicial position of any kind, whether appointed or elected such as:
  - The staff of any public organization or government-controlled entity;
  - A community leader or other person in a position of public trust;
  - Domestic and foreign government ministers, members, officials and civil servants;
  - An officer or employee of a government entity, department or agency;
  - An officer or employee of a state-owned business, school, hospital or other entity;
  - An officer, employee or official of a political party;
  - An officer, employee or official of a public international organization or any department or agency such as the World Bank, United Nations, Red Cross or International Standards Organization;
  - A person acting in an official capacity on behalf of a governmental entity; and
  - Other persons with governmental influence.
- **Third Party** is a person, company or entity with whom Abraj has an agreement to provide a product or service to Abraj or on behalf of Abraj to another entity or person, or upon whom Abraj relies on a product or service to maintain daily operations.

#### 4. Responsibility

- The CEO has the responsibility to approve this document.
- The Compliance officer will be responsible to ensure this document is updated and rolled-out.
- Compliance Committee is responsible for guiding, reviewing and escalating certain subjects based on the criticality.

#### 5. Procedure

##### 5.1 Confidentiality and Distribution

This document is for internal use only and will be retained as per the “Control of documents and data” Procedure.

This document must also not be disclosed, printed or distributed to any unauthorised individuals or parties without the acknowledgement of the document’s custodian.

##### 5.2 Mandated Statement

Abraj has a strong commitment to good compliance and corporate ethics that is led by Abraj management and is reinforced by a strong, prompt response to all issues. Compliance officer has implemented a Compliance Framework designed to ensure Abraj’s compliance with the laws, rules and regulations applicable to our business activities all over the world, in particular anti-bribery and anticorruption laws.

Abraj will comply with, uphold all laws relevant to the prevention of Bribery and Corruption in all the jurisdictions it operates across local, national and international laws, and strive to avoid even the appearance of any non-compliant behaviour. Therefore, Abraj explicitly recognizes that even where the law may be permissive, Personnel must always choose the course of highest integrity.

The Compliance Committee is responsible for the implementation of all anti-bribery and corruption prevention rules and ensure that all gift registers are regularly reviewed.

### 5.3 Bribery and Corruption

Bribery and Corruption are serious offenses that not only harm our organization, but also affect all Personnel of Abraj. Any active or passive involvement by an individual with Bribery or Corruption is punishable with imprisonment and massive financial penalties and will have a serious impact on Abraj's reputation and trust.

It is prohibited for Personnel to either directly or indirectly solicit, accept, offer, provide or authorise bribes. This includes any Advantage, which may be interpreted as a bribe. No Personnel may perform their functions improperly in anticipation or as a consequence of any bribe, but instead to base commercial decisions on commercial criteria only.

It is expected that Personnel should familiarize themselves with what the law permits in any relevant country of operation regarding any advantages offered or accepted by them or on their behalf. In situations of uncertainty regarding the details of any potentially applicable anti-corruption law, Personnel should seek further guidance from their supervisor or the Compliance Committee. For more information on the applicable anti-bribery and corruption laws, refer to section 5.10 'Applicable Laws' in this document.

### 5.4 Public Officials

When engaging with public officials, specific rules and behaviors have to be observed. A public official is anyone in a position of official authority that is conferred by a state, i.e. someone who holds a legislative, administrative, or judicial position of any kind, whether appointed or elected, common examples include:

- Domestic and foreign government ministers, members, officials and civil servants;
- An officer or employee of a government entity, department or agency;
- An officer or employee of a state-owned business;
- An officer, employee or official of a political party;
- An officer, employee or official of a public international organization or any department or agency such as the World Bank, United Nations, Red Cross or International Standards Organization;
- A person acting in an official capacity on behalf of a governmental entity;
- a community leader or other person in a position of public trust; and,
- Other persons with governmental influence.

The offering or providing of any Advantage to a public official in order to unduly influence them in their official capacity (or even having the intention to) is considered as a bribe.

If there is any doubt whether individuals or organizations are considered as public officials, they should, as a precaution, be treated as anyone holding a position of official authority.

#### 5.4.1. Facilitation Payments

Facilitation payments to public officials in order to enable or speed up a process must not be made.

If Personnel are in doubt as to whether a requested or proposed payment may constitute a facilitation payment or if they have other questions in connection with facilitation payments, they should contact their supervisor or the Compliance officer at Abraj.

#### 5.4.2 Abraj Personnel as Public Officials

It is expected that every Personnel will inform themselves about whether or not they qualify as a public or foreign official under local law, and how this reflects on their day-to-day business.

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According to Omani Penal code, the following persons are deemed as public officials:

- 1) Every person holding a government position
- 2) Members of Majlis Oman and members of municipal councils
- 3) Every person assigned a specific task by a competent public authority within the limits of his assignment.
- 4) Representatives of the Government in companies, and employees of companies wholly owned by the Government or those to which the Government contributes more than (40%) forty per cent of its capital.
- 5) Members of the boards of directors of Omani civil associations of public benefit.

Persons who are not deemed to be public officials under local anti-corruption law may still be considered public officials under international laws and regulations. Any question about whether an individual is a governmental official should be directed to the Compliance Committee or the legal function.

### 5.5 Gifts, Hospitality and Entertainment

Personnel should ensure that business courtesies (such as gifts, entertainment and hospitality, hereinafter referred to as “Advantages”) are used to the extent they are permitted under the law and should not be used, offered or provided with the intent to gain benefit, favorability or influence business decisions.

#### 5.5.1 Permissibility Check

An Advantage offered or received is deemed permissible if it passes the following 10-point test: (keeping in mind that the roles could be reversed, and the recipient could be Personnel of Abraj):

1. The Advantage is not excessive in value.
2. The value and nature of the Advantage is not disproportionate to the occasion or the recipient's standing.
3. The nature of the Advantage is not violating the moral and ethical principles of Abraj.
4. It will not create any obligation or expectation on the recipient.
5. It does not give the appearance of (trying to) achieve an undue influence on a business decision or official act.
6. The offering or acceptance will not be performed in secret.
7. The offering will not be performed upon the recipient's explicit request.
8. It is not made in cash or cash equivalent (such as vouchers or gift cards).
9. It is compliant with any applicable laws, including those which may apply to any relevant public officials.
10. The activity would not be viewed unfavorably for Abraj when made public.

It is not permissible to accept or offer an Advantage if the answers to the above listed 10-points are not all affirmative.

Advantages that are not compliant with any of the above 10 points, must be declined, returned to the giver or handed over to Compliance Officer for further handling. The Gift Registry rules shall apply.

### 5.5.2 Gifts

Low value gifts are generally permissible under this document, such as perishable gifts (chocolates or flowers, etc.); low value branded gifts (pens or notebooks, etc.); or seasonal gifts at culturally recognized occasions (Ramadan or Christmas).

The offering or acceptance of a Gift having a single value of more than 50 OMR (~130 USD) is subject to approval by the supervisor and Compliance officer.

The cumulative value of Gifts accepted from the same source or offered to the same person or body in a calendar year must be less than 200 OMR (~520 USD). When you receive any single Gift or Entertainment that is not necessarily exceeding the single value threshold (as above) but will exceed the cumulative value of the same source, then you must report this to Compliance Officer for further consideration. Gifts having a value of less than 25 OMR (~65 USD) do not count toward the annual limit.

The offering of Abraj branded gift/giveaway with a value of less than 15 OMR (~40 USD) per item is permissible at the discretion of the supervisor and does not require involvement of Compliance officer. However, the cumulative value of branded gifts offered to the same person or body has to be observed.

**All Gifts having a single value of more than 25 OMR (~65 USD) are subject to the Gift Register process as set out in 5.5.3.**

### 5.5.3 Gift Register

Compliance officer is required to keep a formal record of Advantages accepted or offered by Personnel that exceed the value of 25 OMR (~65 USD) per Advantage. Advantages that are qualified to be registered can be declared by filling the "Gift & Entertainment:" form, , giving details on the giver, recipient (incl. organization they are employed with), date of receipt/offering, type and value of the Advantage, and the reason for receiving/offering the Advantage (refer to section 6 in "Code of Conduct")

All Advantages brought to the attention of Compliance officer should be captured accordingly.

It is not intended to record every trivial item. Particularly in respect to low-value branded gifts (e. g. pens, notebooks etc.), function leads have some discretion to determine whether it is necessary to make a record for the Gift Register. The same applies for occasions when Hospitality is provided or received in forms of light refreshments, teas or coffees, or canteen food served on business premises. In all cases, the principles as set out in 5.5.5 have to be observed, and internal policies on reimbursement of out-of-pocket expenses shall be followed.

### 5.5.4 Entertainment

By general rule, the offering or accepting of any Entertainment is subject to approval by the supervisor and Compliance officer.

The offering or acceptance of an invitation to an Entertainment is not permissible when the host or a representative of the host is not present during the event.

Abraj further prohibits the offering or acceptance of a morally objectionable Entertainment. It is expected that Personnel immediately decline invitations that appear to violate the ethical values of Abraj and inform Compliance officer.

### 5.5.5 Hospitality

It is understood by Compliance officer that the expenses for a business meal cannot be accurately calculated in advance. In general, business meals are permissible at the sole discretion of the

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supervisor when they remain reasonable, socially acceptable, business oriented and very occasional, in particular:

- **Reasonable:** the overall value of the Hospitality has to be modest and in proportion to the invitee's standing;
- **Socially acceptable:** the Hospitality is, by its nature and location, in consistence with the ethical values of Abraj;
- **Business oriented:** the Hospitality has a business context and the invitation is not extended to family members, friends or persons unrelated to the business relationship;
- **Occasional:** the Hospitality is not offered on a frequent basis (rule of thumb should be not more than twice per calendar year).

Any offering or acceptance of Hospitality outside this framework requires additional approval by Compliance officer. If moment of doubt as to whether an upcoming Hospitality complies with the above requirements, personnel are expected to treat it as a Hospitality that is subject to approval by Compliance officer.

Should it emerge in retrospect that the Hospitality, that did not require approval by Compliance officer, has failed to comply with the above principles, you are required to notify Compliance officer.

### 5.5.6 Declining an Advantage

Personnel must rely on their best judgement to accept or decline an Advantage in situations where there is a social pressure to accept an Advantage that goes beyond policy thresholds as to avoid offending the giver.

In situations where an Advantage that is beyond policy thresholds is accepted, Personnel must report the acceptance to Compliance officer as soon as possible, and no later than the next working day. Compliance officer will then evaluate potential measures to be taken.

## 5.6 Conflicts of Interest

It is important for all Abraj personnel, [vendors and](#) particularly managerial, to be alerted to the connection between conflicts of interest and corruption. Understanding this relationship can lead to the prevention and detection of misconduct and fraudulent activity. While this relationship can be confusing, a simple way to remember the difference between conflicts of interest and corruption is could vs. does. While conflicts of interest do not always lead to corruption, corruption almost always requires a Conflict of Interest.

To prevent conflicts of interest from morphing into corruption, Compliance officer has implemented preventive steps and procedures for handling conflicts of interest. Please note also section 5.2 of Abraj's Code of Conduct.

### 5.6.1 Forms of Conflicts of Interest

Typical conflicts of interest may arise due to personal economic interests, [business](#), political or national affinities, family or emotional ties or any other interests that could interfere with the duties that Personnel performs at Abraj [and/or services provided by vendors](#)

If a conflict arises between Personnel private interests and those of Abraj, it is expected that Personnel immediately inform the Compliance officer through Tasheel or any communication means that is accepted by the compliance officer in order to find an appropriate solution.

[If a conflict arises between vendors and personal relation with Abraj employees and/or between vendors and organizations having any business affiliation with an existing registered company in Abraj](#)

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such as parent company, subsidiary, sister company, and joint venture, it is expected that vendors declare through Vendor conflict of interest declaration forms available during the registration process. The form then will be viewed, approved, and recorded by Quality & Compliance team to take the appropriate action.

If even the hint of a Conflict of Interest appears, any decision (even if it is the right one for Abraj) may be subject to scrutiny. It is prudent to disclose potential Conflicts of Interest early on.

### 5.7 Dealing with Third Parties

Abraj values its partnerships with Third parties, such as clients, suppliers and partners. All transactions with our business partners are made on the basis of fairness, honesty and respect, and we seek to establish mutually beneficial business relationships based on these principles.

#### 5.7.1 Third Party Due Diligence

Abraj may be liable for improper payments made or offered to any entity or person on our behalf by a Third Party. It is therefore essential that appropriate due diligence is carried out on the Third Party's background and reputation and to understand any Bribery and Corruption risks that may exist.

Third Party Compliance Due Diligence comprises the thoughtful screening, instruction and monitoring of Third Parties on a risk-based approach, such as:

- The automated Third-Party integrity screening linked to multiple risk categories (such as sanctions, foreign officials/PEP, state owned enterprises etc.);
- The assessment of the fraud, Bribery and Corruption risk associated with the proposed scope of work and the country in which the business will be conducted;
- The review of the Third Party's business relations and governing structure;
- The review of the terms and arrangements of payment for the Third Party (e. g. offshore payments, payments to an unknown third party, account splitting etc.);
- The request for the Third Party to comply with all applicable laws and regulations on Bribery, Corruption and other prohibited business practices and/or, where applicable, the request to adhere to the Abraj Business Partner Code of Conduct.

The due diligence of Third Parties also comprises the ongoing monitoring to ensure compliance, particularly when the Third Party's organizational structure has significantly changed.

#### 5.7.2 Procurement

Third Parties must be engaged through a fair, formal process consistent with Abraj procurement policies and applicable anti-corruption laws.

Any procurement decision should be based on the best value expected to be received, particularly with regards to pricing, quality, performance, competency, compliance and suitability (including sustainability criteria).

No Personnel may solicit or accept any financial or other Advantage which is offered, provided, requested or received as an inducement or reward for the undue performance of their duties related to procurement decisions.

Personnel must be vigilant in considering the risks presented by any Third Party as a potential procurement partner. If you have any concerns as to whether engaging any Third Party may violate the principles set out in this document, you must refer those concerns to Compliance officer or your focal point at the legal function.

### 5.7.3 Contracts and Remuneration

When services are provided to Abraj or on behalf of Abraj by a Third Party, the following principles apply:

- Each agreement must be in compliance with the laws of the country to which it applies;
- Each agreement must clearly define the respective roles and responsibilities of the Third Party and Abraj, as well as the basis for the remuneration;
- The remuneration should be in line with the fair market value of the services provided;
- Each granting of rebates or discounts shall be properly recorded in the agreement;
- Payments must be in compliance with local legislation and shall be made in the country in which the contracted services are rendered;
- In case of a compliance issue with a Third Party, immediate remedial action must be demanded from said business partner. In serious cases, the agreement must be terminated.

### 5.8 Political contributions

Abraj does not permit any of our funds or resources to be used to contribute to any political campaign, political party, political candidate or any of their affiliated organisations. In the event that you decide to make personal political contributions and/or involve yourself in political activities, you must neither utilize your working time nor use Abraj property or equipment to carry out or support these personal political activities. You are also required to clarify that your views and actions are not those of Abraj.

### 5.9 Charitable Contributions and Sponsorships

Personnel may make charitable contributions or sponsorships on behalf of or in the name of Abraj so long it does not result in Abraj obtaining any improper advantage. All those contributions must be transparent, accountable, recorded, and in accordance with all applicable laws and regulations.

Charitable contributions and sponsorships must not be used as an activity that would provide Abraj with any improper advantage or as an attempt to influence the outcome of any tendering, procurement, or contractual activity. Charitable contributions and sponsorships should only be granted in accordance with the Corporate Social Responsibility (CSR) Strategy.

Any charitable donation must be made directly to a recognized charitable institution and not via another party or individual(s). In case of doubt, refer to the Compliance Committee who may obtain advice from Legal (if necessary)

Ensure appropriate due diligence is conducted on the charitable Institution prior to participating in providing sponsorship or making donations to any Charitable Institution.

### 5.10 Applicable Laws

As Abraj business activities and operations are established with international parties, it becomes essential that all Personnel are aware of the applicable anti-bribery and corruption laws and regulations. These laws include:

- 1) **Omani Penal Code** that contains the key provisions (articles 207-212) governing bribery, which relate solely to bribery of public officials.
- 2) **U.K. Bribery Act** that prohibits companies and their employees from committing various acts associated with bribery anywhere in the world. In particular (1) giving, promising, or offering a bribe; (2) requesting, agreeing to receive, or accepting a bribe; (3) bribing a foreign public official; and (4) failing to prevent bribery.

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- 3) **Additional local laws and regulations:** In instances when operating in a different country, consult with Compliance Officer team to understand the applicable local laws on bribery and corruption (e. g. U.S. Foreign Corrupt Practices Act)).
- 4) **Omani Royal Decree Law for the Protection of Public Property and Avoidance of Conflicts of Interest (112/2011, as amended) (the “Anti Corruption Law”).**

### 5.11 Raising concern

Personnel must immediately contact Compliance officer or utilize the anonymous Whistleblowing process, any communication means that is accepted by Compliance officer if they have any concern that the making or receipt of a payment or the taking of a particular course of action might breach anticorruption laws or the principles of this document.

No Personnel will face penalty or other disciplinary action for reporting a suspected breach of this document, or for refusing to pay a bribe even when Abraj may lose business as a result of the Personnel's refusal to do so.

Refer to the 'Whistleblowing Procedure' for further information.

## 6. References

### 6.1 Related Documents

| Sr No | Document Title                           | Document No    |
|-------|------------------------------------------|----------------|
| 1     | Code of Conduct & Ethics Manual          | Q&C-MS-XX-003  |
| 2     | Anti-Fraud Procedure                     | Q&C-PR-020     |
| 3     | Anti-Money Laundry                       | Q&C-PR-019     |
| 4     | Whistle Blowing Procedure                | Q&C-PR-021     |
| 5     | Corporate Social Responsibility Strategy | MarComm-GL-002 |
| 6     | Control of Documents and Data            | Q&C-PR-013     |

### 6.2 Related Records

| Sr No | Document Title                           | Document No      |
|-------|------------------------------------------|------------------|
| 1     | Gifts and Entertainment Declaration Form | Q&C-MS-FM-XX-031 |
| 2     | Conflicts of Interest Declaration Form   | Q&C-MS-FM-XX-030 |
| 2     | Vendor Conflict of Interest Declaration  | Q&C-MS-FM-XX-039 |

Note: XX – Refer to the latest revision in INTELEX