

Policy statement

ANTI-BRIBERY & CORRUPTION

A.Hak Pipelines & Facilities values its reputation for ethical behaviour and integrity. Conducting business with a zero tolerance approach to all forms of corruption is central to these values, the company's image and reputation. The policy below sets out the standards expected of all employees in relation to anti-bribery and corruption. It is the policy of A.Hak Pipelines & Facilities to prohibit bribery and other corrupt conduct in any form. Bribery and kickbacks involving government officials, customers, suppliers and other counterparties in the commercial marketplace are specifically prohibited. In particular, all employees must adhere strictly to relevant laws in this area, including The Bribery Act.

OBJECTIVE

The purpose of this policy is to state the position of A.Hak Pipelines & Facilities on bribery and corruption and to provide information and guidance on recognising and dealing with bribery and corruption.

SCOPE

This Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company. All employees and associated persons are expected to adhere to the principles set out in this Policy.

OUR ANTI-BRIBERY AND CORRUPTION ASSURANCE PROCESS

The Company will prevent bribery and corruption by our initiative to identify and mitigate risk in the following ways (But not limited to):

- Having in place systems to encourage the reporting of concerns.
- Having in place a Code of Conduct and personnel guide which provide the foundation for our business culture and underscores our commitment to performance with integrity and respect for human rights.
- Building long standing relationships with our suppliers and subcontractors and make clear our expectations of business behaviour.
- Encouraging openness and transparency.

UNDERSTANDING AND RECOGNIZING BRIBERY & CORRUPTION

The risks of corruption are not always obvious. Below are the key areas our directors and employees should be aware of in particular:

- **Excessive gifts, entertainment and hospitality** are acceptable provided they fall within the company's thresholds & criteria.
- **Facilitation payments:** are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The firm will not tolerate or excuse such payments being made.
- **Reciprocal agreements:** or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management.
- **Actions by third parties for which the firm may be held responsible:** can include a range of people i.e. agents, subcontractors, supplier and consultants, acting on the firm's behalf. Appropriate investigation should have been undertaken before either of these kind of parties are engaged.
- **Record keeping:** we ensure that we have robust controls in place so that our records are accurate and transparent.

REPORTING CONCERNS

All directors and employees of A.Hak Pipelines & Facilities must report any concerns that they may have that anyone (either an A.Hak employee or any associated person) may be in breach of the Bribery Act. A.Hak Pipelines & Facilities employees should report any such concerns to their Human Resource officer and/or direct Manager. The involvement will be kept confidential.

COMMITMENT & REVIEW

This policy demonstrates A.Hak Pipelines & Facilities board approach to Anti-Bribery & Corruption. We implement our policy in compliance with the valid codes, specifications, legislations and regulations.