



# Anti-Bribery Policy Statement Incorporating Anti-Slavery

## Introduction

The purpose of this policy is to provide guidance for IESCO International staff and associated persons involved in any IESCO International activity, to ensure compliance with statutory requirements whilst enabling IESCO International to meet its aims and objectives.

IESCO International has zero tolerance of bribery and fraud committed by any person working for IESCO International, or any person who provides services on behalf of the company. Any allegation of bribery will be investigated by in accordance with IESCO International disciplinary procedures and may be reported to the authorities. Any individual who is found to have committed bribery will be subject to disciplinary actions as defined in the Disciplinary Policy.

IESCO International has zero tolerance of acts of slavery or human trafficking by any person working for the company, or any person who provides services on behalf of IESCO International Any allegation of slavery will be investigated by IESCO International in accordance with the company's disciplinary procedures and may be reported to the authorities.

IESCO International has a hard-won reputation for acting with integrity, transparency and honesty. We are committed to the prevention of bribery because we recognise the importance of maintaining our reputation and the confidence of the public and other partner organisations.

IESCO International will not work with other organisations which we consider do not share our commitment to preventing bribery, corruption or acts of slavery.

## Legislative requirements

As a reputable UK registered company Salama Petrochemical and Oil Services Co must comply with the Bribery Act 2010 and the Modern Slavery Act 2015.

## Definition of a bribe

A bribe is:

1. the act of offering, promising or giving a financial or other advantage to another person.
2. with the intention of inducing conduct that amounts to a breach of an expectation that the person will act in good faith, impartially, or in accordance with a position of trust.

It is an offence under the Bribery Act to offer a bribe or accept a bribe. A bribe can be given or received by an employee or associated person. Bribes can include money, gifts, hospitality, loan payments, business or another advantage. A bribe must encourage the recipient to act in a way which is dishonest, illegal, or a breach of a position of trust.

It is an offence under the Bribery Act to offer a bribe to a foreign public official. Bribes to foreign officials include the payment of facilitation payments. A 'facilitation payment' is when there is an offer of money to a public official in order to expedite or gain an improper advantage.

Corruption is the misuse of entrusted power for personal gain.

## **Failure to prevent bribery**

The Bribery Act also makes it an offence for an organisation to fail to prevent bribery. This is commonly called the 'corporate offence'.

If a IESCO International employee or associated person breaches the Bribery Act, then the company could be found to have committed the offence of failing to prevent bribery. This offence can be committed by any 'relevant commercial organisation' which carries on a business in any part of the UK, even if the offence itself takes place abroad.

The Ministry of Justice has issued guidance on the Bribery Act and this guidance includes a description of a 'relevant commercial organisation'. The guidance is clear that even if an organisation pursues primarily charitable or educational aims, or purely public functions, it can still be a 'relevant commercial organisation'. S is therefore liable for prosecution if there is a breach of a corporate offence.

IESCO International would be guilty of an offence if an associated person to IESCO International bribes another person to obtain business or a business advantage. The test of who is an associated person is drawn very widely: any person who 'performs services for or on behalf of' an organisation will be an associated person. This includes but is not limited to employees, appointees, agents or subsidiaries.

It is a defence to the corporate offence if an organisation is able to show that it has adequate procedures in place. It is important that all employees and associated persons adhere to this Anti-Bribery and Corruption Policy and to IESCO International's Gifts, Hospitality and Sponsorship Policy.

## **Employees and third-party responsibilities**

- Behave honestly, be trustworthy and set a good example;
- Make a clear distinction between the interests of IESCO International and your own private interests to avoid any conflict of interest. If any conflict should arise you should report it to a Director immediately or at the soonest time thereafter;
- Report all incidents which are contrary to this policy to a Director

These include:

- if you are asked to make a bribe
- if you are offered a bribe
- if you suspect this may happen in the future
- if you believe that another person associated with IESCO International has been asked to make a bribe or has been offered a bribe
- Do not accept or offer bribes.
- Report gifts and hospitality offered/provided when acting for IESCO International;
- Do not offer money (a facilitation payment) to any public official in order to expedite or gain an improper advantage;
- If you are faced with a demand for a facilitation payment you must actively resist the payment and report the demand to a Director immediately or at the soonest time thereafter.

Listed below are some examples of bribes. Please note this is not an exhaustive list:

- accepting/giving a cash payment to influence a decision;
- accepting/offering gifts and hospitality which are excessive and not within the norm of your business practice;
- paying for, or receiving goods or services for personal gain to influence a decision, e.g. offering/accepting a holiday, use of holiday homes, private jets, flights etc.

## **Consequence of breach**

If there is a breach of the Act by an employee or an associated person, the individual and/or SQA could be liable to prosecution in the UK courts.

If found guilty, the maximum penalty the courts can impose on an individual and/or SQA is:

- an unlimited fine;
- a 10-year prison sentence for an individual; or
- both.

### **Tendering and bidding exercises**

All IESCO International staff and associated persons involved with any IESCO International - related tender exercises must take care to avoid conduct which could be perceived as offering or accepting a financial or other advantage to influence the outcome.

### **Business development**

IESCO International does not allow the giving of (or the promise to give) gifts, hospitality or payment with the intention of influencing a decision to receive a business advantage or to provide a reward for a business advantage already given.

### **Charitable and political donations**

IESCO International does not make any financial payments to any charitable organisations or political parties.

### **Corporate hospitality**

SQA personnel and associated persons offering corporate hospitality should take care to ensure:

- the purpose of the hospitality is to maintain good working relationships with existing clients;
- the recipient is not given the impression that they are obliged to confer any business advantage;
- the recipient's independence is not affected/

### **Definition of a Slavery and Human Trafficking**

The legal definition is:

"Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs."

IESCO International has a zero tolerance to acts of Slavery and human trafficking by any supplier or individual engaged by IESCO International to carry out services. IESCO International will report all breaches of the act to the authorities and will terminate all contracts with the supplier and individual with immediate effect.

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