

## **Anti-bribery and Corruption Policy**

Corruption is the willingness to act dishonestly in return for money or personal gain and is an aspect of human behaviour witnessed in society for some time. Due to corruption, a few individuals abuse their power or position wrongly benefiting. Corruption creates unfair competition, damages innovation and undermines integrity.

For purposes of this Policy, it is assumed that this Anti-corruption Policy applies to everyone and every party associated with BPPL, no matter where an employee is stationed. This Policy states the Company's position with regard to Anti-corruption. All Employees, Consultants, Directors, and Board members (collectively hereinafter referred to as 'Company Personnel') are required to fully comply with this Policy and the provisions of all applicable Anti-corruption Laws.

Compliance with this Policy and laws is a condition of continued employment or association with BPPL, and violations will not be tolerated – any alleged breach will be investigated and disciplinary action taken as appropriate. (Please refer Administrative Circular on 'Employee Discipline Policy and Procedure' – HR/13/08 dated 01<sup>st</sup> August 2014)

Failure by Company Personnel to comply with this Policy may expose the Company to substantial risk and could jeopardize its operations and reputation. Employees should also be aware that violations of certain Anti-corruption Laws may subject individual Company Personnel to both criminal penalties, including prison sentences, and civil liability.

Company Personnel are prohibited from giving or offering bribes, kickbacks, or similar payment or consideration of any kind, whether at home or abroad, to/from any person or entity (including but not limited to any customers or potential customers, government official, political party, candidate for political office or any intermediaries, such as agents, attorneys or consultants) in order to:

1. Influence official acts or decisions of that person or entity,
2. Obtain or retain business or a business advantage for, or direct business to, the Company; and/ or secure any improper advantage. Similarly, BPPL does not accept and does not condone the acceptance or receipt of bribes from anyone,
3. Influence one's official acts or decisions,
4. Obtain or retain business or a business advantage for, or direct business to, the offer or of the bribe and/or any entity that he/she represents,
5. Secure any improper advantage for the offer or of the bribe and/or any entity that he/she represents.

Company Personnel are also prohibited from providing or receiving gifts, meals, entertainment or anything of value to any person or entity in connection with Company business unless it is provided or received in accordance with the BPPL Code of Conduct, the Company's Policy on Gifts, Entertainment and Other Benefits.

Bribes do not just involve cash payments. Lavish gifts, expensive dinners or wine, tickets to sporting events, and jewelry or gems have all been found to be bribes. Payments made to members of a government official's family in order to influence the government official are also prohibited.

This Policy does not just apply to the person who pays the bribe or offers a token of value – it also applies to the people who have taken action in furtherance of the same. For example, this policy could apply to anyone who:

- Approves or authorizes the payment,
- Creates or accepts false invoices,
- Relays email instructions to pay or accept a bribe or kickback,
- Covers up an illegal payment,
- Knowingly cooperates in the payment of a bribe, or
- Suspects an illegal payment or kickback but turns a 'blind eye' to it.

### **Compliance with the Policy**

It is the responsibility of all Managers and Executives to ensure compliance with this policy in each division. Ultimate responsibility for compliance with this policy throughout the group is taken by the Head of Human Resources and Administration. However, all employees have an obligation to act with integrity and to ensure that we understand and comply with the policy. Ongoing compliance will be monitored and reported by Internal Audit.

Training will be provided to relevant employees throughout the group to support them in complying with their responsibilities. If an employee is not selected for training but believe that it is relevant, they should request the HR division for further information. In addition, all employees will be required to confirm that they have understood and complied with the policy.