

## Anti-Bribery and Corruption Policy

**Pevco Kenya Ltd** is built on strong human, entrepreneurial and family values, initiative, integrity, and imagination. Since its inception in the year 2012, these values have contributed to its success. We are well known and respected for our expertise and our business performance, our social and societal initiatives, and our ethics. Our customers, our service providers and our partners expect us to be exemplary in every way. The image of **Pevco Kenya Ltd**, as well as its long-term success and performance, depend on our ability to meet these expectations.

As a responsible company, we have drafted a code of ethics grouping all the rules and values to be adopted and applied by all employees. In a world that is changing faster and faster, this code is a considerable base that will inspire us every day and guide us in our decisions.

As a company, an employer, and a good corporate citizen, Pevco Kenya Ltd must be exemplary and implement the highest standards in terms of integrity. Pevco Kenya Ltd, rely on every one to read this code attentively, to abide by it and ensure those around you also abide by it.

### Preamble

This Code of Ethics is the cornerstone of Pevco Kenya Ltd commitment to maintain the highest levels of business ethics, personal integrity and compliance across its business. It defines our company's expectations for our collaborators' working relationships, collaborators, customers, governments, public officials, business partners, suppliers, competitors, and the wider community.

The purpose of this document is to reiterate the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the company within all regions and functions.

### Understanding bribery & corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way considered to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

## **Our Policy**

Pevco Kenya will not tolerate bribery or corruption in any form.

The firm prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

*To or from* any person or company wherever located, whether a public official or public body, or a private person or company;

*By* any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf;

*In order to* gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

Normal hospitality, provided that it complies with the firm's Corporate Entertainment Policy;

Fast tracking a process which is available to all on the payment of a fee; and/or

Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to the Head of Technical and Operations for guidance.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

## **Potential risk scenarios (Red flags)**

Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

**Excessive gifts, entertainment and hospitality:** can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they fall within the firm's Corporate Entertainment Policy.

**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. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

**Actions by third parties for which the firm may be held responsible:** can include a range of people i.e. agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorized and recorded.

**Record keeping:** can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

There is no permitted deviation or waiver from this Policy

### **Employee responsibility and reporting**

All employees and others acting for, or on behalf of, the Company are encouraged to report any such incidence in accordance with the procedures set out in the Policy or in the case of third parties to a director or officer of the company. We encourage Whistleblowers and the Company will unequivocally support any individual who, in good faith, contacts us and reports any suspicious incidences of malpractice or wrongdoing in regard to this Policy. Any such reports will be treated in strictest confidence.

*We seek to promote trade and trust in the world.*