

<b>SCC/POL/HRL 004</b>		<b>ANTI-BRIBERY &amp; CORRUPTION POLICY</b>	
Date	21-Apr-17		
Revision	1.0		

### 1.0 Purpose

The purpose of this policy is to demonstrate the approach of Sarooj Construction Company (“the Company”) towards bribery & corruption and to outline the prevention measures that must be adhered to by all employees.

This policy exists to ensure compliance with the Company’s Anti-bribery and Corruption principles and to provides a guideline on how employees are expected to behave at all times in order to protect the integrity of our work ethic and the reputation of ourselves and our clients.

### 2.0 Scope

This policy shall apply to stakeholders formally classed as “employees” across all band ranges. This policy also applies to any volunteers, contractor or any temporary/permanent representative of the Company.

This policy is the primary documentation and guideline which shall be used to determine how anti-bribery and corruption principles are applied within the Company.

### 3.0 Policy Statement

The Company conducts its business in a legal and ethical manner at all times. All Company officers, employees and other representatives are expected to act honestly and with integrity and must ensure that their representative behaviors and activities do not conflict with these obligations, regardless of seniority.

This policy is based on the current anti-bribery legislation of the Sultanate of Oman. Employees of the Company or any associating body operating within the Sultanate must not, either directly or indirectly:

- a) Solicit, offer, give or accept any bribe of any form (cash or otherwise) to or from any person or company either inside or outside the Sultanate, regardless of the seniority of the person aiming to engage in the act of bribery or corruption.
- b) Gain or retain any contractual, commercial or regulatory advantage through illegal or unethical means when conducting business on behalf of the Company or its subsidiaries.

#### 3.1 Value Alignment

As an organization with a core set of guiding values, it is our belief that such values can enable and enhance good performance across all levels. These values help us to remain true to our character, make effective decisions and behave in ways that are commendable and ensure that we stand out as a model competitor within our market.

It is the responsibility of every line manager working for the Company, to ensure that SCC values are communicated and understood, while also being linked to the principles of this policy in the correct way.

#### 3.2 Definitions

- 3.2.1 Bribery** is the offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract.
- 3.2.2 Inducement** can take the form of gifts, hospitality, fees, rewards, jobs, favours or other advantages. It does not matter whether the bribe is given or received directly or through a third party or whether it is for the benefit of the recipient or some other person.
- 3.2.3 Corruption** is the misuse of power for personal gain, whether directly or for the personal gain of a family member, friend or linked associate.

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### 3.3 Anti-Corruption & Bribery Principles

- 3.3.1** This policy applies to all of the Company's activities and operations and to all of its dealings and negotiations with third parties in all countries in which its employees, agents, partners and associates operate. All employees and individuals working on behalf of, under contract from or in collaboration with any part of the Company or with its employees are required to comply with this policy.
- 3.3.2** The Company has a zero-tolerance approach to bribery and corruption and as such, all forms of bribery and corruption are prohibited. A bribe does not actually have to take place – just promising to give or agreeing to receive a bribe is prohibited.
- 3.3.3** Arrangements with third parties are subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. The Company will not engage, or continue business with, any individual or third party who we know or reasonably suspect of engaging in bribery or corruption.
- 3.3.4** Employees or any other associated person will not suffer any penalty or other adverse consequence for refusing to pay bribes, even if the refusal may result in loss of business or a delay in proceedings.
- 3.3.5** The prevention, detection and reporting of bribery are the responsibility of all employees. Employees should raise any concerns or allegations of bribery or corrupt activity with their line manager or report any such concerns to the HR Manager. Where staff feel they are not able to report in this way, they should report directly to the Director.

### 3.4 Methods of Prevention

Line managers are responsible for ensuring that risks are assessed, and the necessary actions are taken to ensure compliance with this policy. Should it be discovered that an individual has committed an act in violation with this policy, line managers must escalate this to both the HR Manager and the Deputy Director. Direct employees of Sarooj who are found to be in violation of the policy principles shall be subject to the Company's Disciplinary Procedures and the anti-bribery laws of the Sultanate of Oman.

### 3.5 Communication

The company shall endeavor to make all employees aware of the guidelines contained herein. This policy shall be reviewed on an annual basis and amendments will be communication to all line managers.

### 4.0 Miscellaneous

It is the responsibility of the line manager to ensure that their direct reports are aware of all company ethics and standards. This policy is in effect as of May 2018 and supersedes any prior policy or agreements made before this.

Revision	Date	Amendment	Content Owner	Mandated By
1.0	21-Apr-17	Draft	Issa Al-Bahlani	Simon Karam