



Building & Civil Engineering Contractor

57 Alhaja Kofoworola Street, Balogun Bus stop.

Off Obafemi Awolowo way. Ikeja. Lagos.

info@greyfieldintegratedservices.com

www.greyfieldintegratedservices.com

+234 817 490 9454

+234 802 387 8057

ANTI-BRIBERY AND CORRUPTION (ABC) POLICY

Introduction

Since its founding, Greyfield Integrated Services (GIS) business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. GIS reputation remains one of the Company's most important assets today.

The purpose of this policy is to reinforce GIS business principle of zero tolerance to bribery and corruption by providing a framework to guard and promote the Company's reputation for integrity and responsibility. The policy will support the implementation of the GIS Anti Bribery and Corruption programme underpinned by robust policies and transparent processes.

Scope

It is GIS policy to comply with all Nigerian laws, rules and regulations governing anti bribery and corruption. As a future global company, GIS, its employees and officers will also be bound by the anticorruption laws of countries where we do business.

This Policy applies to directors, employees, agents, intermediaries, consultants and any other persons, organisations or bodies doing business with GIS and employees.

Bribery

The direct or indirect offer, payment, soliciting, authorisation or acceptance of bribes in any form (including favours) is not allowed. No bribes of any sort may be solicited from, paid to or accepted from customers, suppliers, agents, consultants, intermediaries, joint ventures or other business partners, stakeholders, politicians, and/or government officials.

It is not permitted to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions or decisions.

GIS will promote its policy on bribery and corruption amongst its directors, employees, business partners, stakeholders, contractors, vendors and suppliers.

Facilitation Payments

Recognizing that facilitation payments are bribes, GIS expressly prohibits such payments. Thus, directors, officers, employees, agents, customers, sub-contractors, suppliers, vendors, joint venture or other business partners and stakeholders are not allowed to solicit, make or receive facilitation payments on behalf of GIS. They are also not allowed to solicit, make or receive such payments for themselves or any other person whomsoever in the course of GIS business.

Gifts, Hospitality & Expenses

GIS prohibits the solicitation, offer or receipt of gifts and hospitality whenever they could affect or be perceived to affect the outcome of business transactions or decisions and are not reasonable and bonafide or consistent with the GIS Statement of Business Principles, Code of Conduct and the Anti-Bribery and Corruption (ABC) Manual.

Seasonal Gifts shall be GIS branded corporate items of nominal value (no hampers or live animals).

Gifts and Hospitality must be disclosed, declared and recorded fairly and accurately in GIS books and records.

No expenditure of gifts, travel, lodging or entertainment for any Government Official or business partner or third party may be for the purpose of influencing any official action or to procure any improper advantage.

Donations & Sponsorships

Charitable donations and sponsorships must not be used as a subterfuge for bribery and must be consistent with GIS Business Principles and Code of Conduct.

Charitable donations and sponsorships shall not be provided to any organization upon the suggestion or request of a public (government) official or for the purpose of influencing a public official.

GIS shall not make payments and/or donations to political parties, organizations or their representatives.

Agents & Intermediaries

When retaining, paying or working with an agent or intermediary, it is mandatory to:

- Undertake properly documented due diligence.
- Have a solid, documented basis for trusting the intermediary.
- Take reasonable steps to monitor for and prevent misconduct
- Ensure compliance with the GIS ABC Policy & Manual

Sub-contractors & Suppliers

GIS shall:

- Conduct its contract and procurement practices in a fair and transparent manner.
- Avoid dealing with Sub-contractors and suppliers known or reasonably suspected to be paying bribes.
- Undertake due diligence in evaluating prospective sub-contractors and suppliers to ensure that they have effective anti-bribery & corruption programmes.
- Make known its ABC Policy and Business Principles to sub-contractors, agents, intermediaries, suppliers, joint venture partners and other business partners and expect compliance from them.
- Ensure compliance with the GIS ABC Policy & Manual.
- Take reasonable steps to monitor for and prevent misconduct.

Fraud

Fraud is described as the wilful or dishonest misuse of GIS resources, including intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it. It also includes acts of dishonesty, deception, or of omission, the improper use of influence or position and/or improper use of information.

GIS has a zero tolerance policy towards fraud and is committed to the promotion of an antifraud culture in the Company. Management and staff are responsible for preventing, detecting and reporting fraud and promoting this policy with third parties.

It is GIS policy that there will be a thorough investigation of all allegations or suspicions of fraud and necessary actions will be taken where fraud is proven in line with the ABC policy.

Human Resources

GIS human resources practices including recruitment, promotion, training, performance evaluation, remuneration and recognition will reflect the Company's commitment to the ABC policy.

Training & Certification

Directors, Managers, employees and agents of the Company shall receive appropriate training and guidance on the ABC programme. Every Director, Manager, Employee and agent shall be required to produce an annual certificate of compliance with the GIS ABC Policy and Manual.

Communication

GIS will ensure effective internal and external communication of the ABC Policy

Documentation & Record Keeping

GIS books and records must be kept with reasonable detail and accuracy so that they fairly and correctly reflect all transactions in accordance with established procedures and be subjected to audit.

All controls and approval procedures must be followed.

GIS books and records must not contain any false, misleading or other artificial entries.

Internal Control & Assurance

GIS shall maintain an effective system of internal controls to counter bribery and corruption and subject these controls to regular reviews and audits to provide assurance on their design implementation and effectiveness.

Monitoring & Review

GIS shall establish feedback mechanisms and other internal processes supporting the continuous improvement of the Anti-Bribery and Corruption programme.

Management shall undertake periodic reviews of the ABC compliance programme and measures, designed to evaluate and improve their effectiveness in preventing and detecting bribery and corruption, taking into account relevant developments in the field and evolving international and industry standards. Such reviews may be undertaken internally or by an independent third party.

Management will report the results of the programme reviews to the Business Risk Assurance Committee, Corporate Audit Committee and the Board.

The Governance, Risk and Compliance Department shall prepare and present an annual report on ABC compliance program to the Business Risk Assurance Committee, Corporate Audit Committee and the Board.

Raising concerns & seeking guidance

GIS will provide secure and accessible channels through which directors, officers, employees, subsidiaries, agents, consultants, suppliers, sub-contractors, joint ventures partners or other business partners should feel able to raise concerns and report violations in confidence and without risk of reprisal.

These or other channels should be available for employees and other stakeholders to seek advice on the application of the ABC programme.

Responsibilities

It is the responsibility of the Board to demonstrate visible commitment to this policy and the ABC programme based on the GIS Business Principles and provides leadership, resources and active support for management's implementation of the programme.

The MD/CEO is responsible for ensuring that the ABC Policy and programme is implemented consistently across the Company.

It is the responsibility of management to lead by example, to ensure that all employees are aware of the ABC policy and programme, and behave in accordance with the spirit as well as the letter of the Policy.

Management is responsible for establishing effective measures for providing guidance and advice to directors, officers, employees and business partners on compliance with the ABC programme and measures.

It is the responsibility of employees of GIS and those who work for and with GIS to adhere to the requirements of this Policy.

Compliance with the ABC Policy is mandatory for directors, employees and all who work for or conduct business with GIS.

Every director, officer, employee or business partner of GIS is required to report to GIS violation of the ABC Policy.

Sanctions

Breach of the provision of the ABC Policy and Manual constitutes serious misconduct and will be subject to appropriate disciplinary measures including, but not limited to, termination of employment or appointment of the affected officer or employee.

Breach of the ABC Policy and Manual by agents, sub-contractors, intermediaries, suppliers, vendors, consultants, joint venture or other business partners may lead to the termination of such business relationships.

Breach of the ABC policy or manual may also result in civil or criminal proceedings against defaulters.

For: **GREYFIELD INTEGRATED SERVICES LIMITED.**



DATE: 28th Oct 2016

Bldr. Aiteobhor, Lynus MNIOB
Chief Executive Officer