

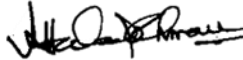




Locus Engineering Management and Services Co. W.L.L

Human Resources Department Anti-Bribery and Anti-Corruption Policy

PRO-HR-02

Prepared by	Endorsed by	Approved by
		
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Acronyms:

LEMS	Locus Engineering Management & Services Co. W.L.L
LA	Legal Advisor
SLA	Senior Legal Advisor
QHSEM	Quality, Health, Safety, Environment Manager
CM	Commercial Manager
FM	Finance Manager
DOO	Director of Operations
MD	Managing Director
HRM	Human Resources Manager



Table of Contents

1.0	POLICY	4
2.0	OBJECTIVES	4
3.0	SCOPE OF COVERAGE	4
4.0	BRIBERY AND CORRUPTION DEFINITION	5
5.0	PRINCIPLES AND PROHIBITION	5
6.0	RECORDS AND REPORTING	5



INTEGRATED MANAGEMENT SYSTEM
COMPANY POLICY & PROCEDURE

PRO-HR-02
Rev. 0
Date 10.06.2020
Next Review: May 2023
Page 4 of 5

1.0 POLICY

LEMS (“Company”) upholds a zero-tolerance position on bribery and corruption. It is the policy of the Company to maintain the highest level of professional and ethical standards in conducting its business. This anti-bribery and corruption policy (“Policy”) exists to set out the responsibilities of the Company and those who work for and/or with us in regards to observing and upholding our zero-tolerance position on bribery and corruption. The Company is committed to comply with all applicable laws governing the conduct of the Company’s operations in Qatar and worldwide.

2.0 OBJECTIVES

- 2.1** This Policy acts as a principle, source of information and guidance for the Company and helps the Company, its officers, directors, employees (including secondees and contracted personnel), agents, consultants and other representatives of the Company, including any members (shareholders) acting on behalf of the Company to recognize and deal with bribery and corruption issues as well as understand their duty and responsibilities.
- 2.2** All officers, directors, employees (including secondees and contracted personnel), agents, consultants and other representatives of the Company, including any members (shareholders) acting on behalf of the Company shall have an obligation to exercise utmost fairness, honesty, objectivity, and diligence and maintain an exemplary level of ethical behavior in the performance of their duties to the Company and shall reject bribery in all its forms and inform their immediate supervisors of any such approaches by any individual.

3.0 SCOPE OF COVERAGE

- 3.1** This Policy applies to the Company and all its subsidiaries. All the officers, directors, employees (including secondees and contracted personnel), agents, consultants and other representatives of the Company, including any members (shareholders) acting on behalf of the Company are expected to comply to this Policy, any other related internal policy and all applicable laws governing the conduct of the Company’s operations in Qatar and worldwide. The Company will constantly uphold all applicable laws relating to anti-bribery and corruption in all the jurisdictions in which the Company operate.
- 3.2** This Policy shall apply in line with the Company’s other existing policies which shall include but not limited to the Company’s Code of Conduct Policy, Code of Ethics Policy and Conflict of Interest Regulations.

4.0 BRIBERY AND CORRUPTION DEFINITION

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision in order to gain commercial, contractual, regulatory, or personal advantage. Corruption refers to dishonesty and illegal behavior by person(s) in positions of authority or power. Both offering and accepting bribery are illegal and will not be tolerated by the Company in contravention of this Policy or any other policies of the Company.



INTEGRATED MANAGEMENT SYSTEM
COMPANY POLICY & PROCEDURE

PRO-GS-01
Rev. 0
Date 10.05.2020
Next Review: April 2023
Page 5 of 5

5.0 PRINCIPLES AND PROHIBITIONS

- 5.1** The Company does not accept and will not make any form of facilitation payments and/or kickbacks that involves expediting or facilitating the performance of a public official for a routine governmental action.
- 5.2** The Company will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates.
- 5.3** The Company does not and will not condone the giving, offering of any payment, gift or hospitality with the expectation or hope that a business advantage will be received or to reward a business advantage already given.
- 5.4** The Company will not accept any payment, gift or hospitality from a third party if the Company knows or suspects that it is offered or provided with an expectation that the Company will provide a business advantage in return.

6.0 RECORDS AND REPORTING

- 6.1** If anyone suspects that there is an instance of bribery or corrupt activities occurring in relation to the Company, such person is encouraged to raise their concerns at as early a stage as possible. If uncertain about whether a certain action or behavior can be considered bribery or corruption, such person should speak to the Company's Legal Advisors from the Legal Department.
- 6.2** Company will not:
- 6.2.1 turn a blind eye to any of the above;
 - 6.2.2 threaten or retaliate against those who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - 6.2.3 engage in any activity that might lead to a breach of this policy.
- 6.3** The Company will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made.
- 6.4** The Company will continually assess the effectiveness of this policy and will review the implementation of it on a regular basis in terms of its suitability, adequacy, and effectiveness.