

**Salama Fikira**

**Anti-Bribery and Corruption Policy**

<b>Date of Most Recent Change</b>	<b>Details of Change</b>
12 Jan 2022	Change to new SF-Group Template.

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# 1. Introduction

## 1.1. Aim

Salama Fikira (SF) expects its employees and consultants to be scrupulously impartial and honest in all affairs relating to the Company and their role within it. All employees and consultants bear a responsibility to act as ambassadors for the Company in terms of their general conduct both within and outside the organisation.

This Code sets out the behaviours we expect of our employees, consultants, suppliers, contractors, agents and partners. We are committed to complying with all applicable legal requirements and working to the highest ethical standards. This Code is a guide to the general principles that inform the way we work with each other and our relationships with clients, suppliers, vendors, competitors, government bodies and the public. This Code is not a substitute for accepting individual responsibility and we must each exercise sound judgement and common sense in our actions and dealings with others and seek advice as necessary if in doubt. Those who supervise others have additional responsibilities, they must lead by example, and give those who report to them the necessary resources and support to understand and follow this Code's requirements. If after reading this Code, you have any questions or queries about its application to your work or circumstances, you should speak to your manager, team leader or a member of the senior management team. The Company will regard failure to observe the provisions of this Code as serious misconduct.

Our people are our single most important asset; you create and support our reputation and ensure our progress and success. This Code demonstrates our commitment to supporting you. We do not tolerate any discrimination or harassment of our people and we have processes in place to enable us to support our employees and consultants should they experience unacceptable behaviours in our Company.

The senior management are responsible ultimately for all ethics and compliance related matters and will not allow the integrity of the business to be compromised.

Our good reputation is paramount and we do all we can to protect it through lawful, honest and transparent practices. Every member of the SF team is expected to adhere to the following values:

- Proficiency and quality integrity and honesty
- Client confidentiality and discretion
- Respect for industry regulation, national and international law and human rights
- Corporate transparency
- Transparent interaction with governments and international institutions
- Employer duty of care

## 1.2. References

This policy has been developed with reference and in line with the following legalisation and standards:-

1977: U.S. Foreign Corrupt Practices Act

1997: The Organization for Economic Cooperation and Development OECD Convention on Anti-bribery.

[http://www.oecd.org/daf/anti-bribery/ConvCombatBribery\\_ENG.pdf](http://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf)

1997: World Bank Anti-Corruption Standards

[http://siteresources.worldbank.org/INTLAWJUSTICE/Resources/Guidelines\\_CC\\_PforR\\_Rev\\_7\\_10\\_15.pdf](http://siteresources.worldbank.org/INTLAWJUSTICE/Resources/Guidelines_CC_PforR_Rev_7_10_15.pdf)

2010: U.K. Anti-Bribery Law Enhanced

2005: U.N. Convention on Corruption

Hong Kong: Independent Commission Against Corruption Ordinance, Cap. 204 (ICAC) Ordinance,

Hong Kong: Prevention of Bribery Ordinance Cap. 201 (POBO)

### 1.3. **Scope**

This is a global policy is to be used across the Salama Fikira group of companies by managers, employees and consultants at all levels.

### 1.4. **Circulation**

The information contained within this policy is for internal use by Salama Fikira employees although may be shown to clients and third parties on request.

## 2. **Bribery & Other Corrupt Behaviour**

### 2.1. **Introduction**

Salama Fikira has implemented an Anti-Bribery and Corruption Policy, which has at its core, the commitment to conducting business in an open and accountable way.

Salama Fikira strives to maintain a high standard of integrity, client confidence and good corporate governance. This can only be achieved and maintained if the public is confident that employees and sub-contractors, are not influenced by gifts, benefits and bribery and that employees and sub-contractors do not seek influence through the giving of gifts, benefits or bribes.

This policy applies globally. If travelling, Salma Fikira employees & Consultants are subject to the laws of the country they are in however, the principles of this policy must be followed regardless of whether or not that country has specific bribery and corruption laws.

As a guiding principle this policy will be supported in its implementation by Salama Fikira's Consequence Management Policy.

### 2.2. **Definition of Bribery**

Bribery is generally defined in two ways:-

An offer, a promise or a gift of a financial or other advantage to another.

A request, agreement to receive or an acceptance of a financial or other advantage.

Both acts must be linked to an intention to influence the improper performance of a relevant function or activity.

It does not matter whether the one who receives the financial or other advantage is the person who performs the relevant function or activity improperly. What matters is that there is an intention to influence the improper performance of the function to which the bribery relates.

### 2.3. **Facilitation Payments**

Salama Fikira does not make or condone facilitation payments. Any requests for facilitation payments must be reported.

## 2.4. Tolerance

The company has a zero tolerance of corrupt activities including bribery.

In the unfortunate event that a person gives a bribe under duress, such as when a person is at a risk of loss of limb, life or liberty, such person is still considered to have committed the offence of bribery and will be required to demonstrate sufficiently that the person genuinely believed that the risk was real and imminent.

The person involved must report such an occurrence as soon as practicable through the normal reporting channels.

## 2.5. Reporting

It is the responsibility of all employees, consultants, and contractors to report non-compliant activity. Third parties are also to be encouraged to report non-compliant activity.

In the event of an incident or potential incident being reported, the Head of Compliance is to directly report the incident to the CEO and Board of Directors as soon as reasonably possible.

## 2.6. Use of Business Development Agents

Provide evidence of their own or agree to adopt Salama Fikira Policy for all interactions with on behalf of Salama Fikira.

Where these agents are used they will only be used for low value contracts (contracts with a total value of less than USD50, 000 per year). Agents will either be able to meet the ABC requirement demanded of suppliers or where they are sole trading entities they will agree to adopt Salama Fikira Policy for all interactions with on behalf of Salama Fikira. They will also be provided training and support as required.

## 2.7. Enforcement of the ABC Policy

Enforcement of the ABC policy will be in line with the Consequence Management Policy.

Most countries have laws that prohibit corruption. Breaching these laws is a serious offence which can result in fines for us and imprisonment for individuals. We prohibit any employee, consultant, agent, sub-contractor or supplier from making or offering any payment or other form of inducement to any person in order to attempt to secure an improper commercial advantage for our business. Accepting gifts, kickbacks, improper payments or favourable treatment from any person who is or is to become a supplier, customer or competitor of our business to either obtain or retain business undermines our credibility and is strictly prohibited.

## 2.8. Gifts and Hospitality

Employees/consultants are permitted to offer and/or accept customary levels of appropriate business entertainment in accordance with the gift policy.

## 2.9. Training

### 2.9.1. Employees

As part of the Induction Process, new employees will be made familiar and understand the ABC Policy.

Senior and Mid Management will make personal declarations that they will comply with the ABC policy.

All employees within the company will receive anti bribery and corruption training at least annually and refreshed of the reporting process.

Employees considered 'at risk' identified by the Company's Strategic Risk Assessment may receive further online training through an external provider.

### 2.9.2. Consultants

As part of the Induction Process, new consultants will be made familiar and understand the ABC Policy.

Team leaders will receive anti bribery and corruption training at least annually and reminded of the reporting process.

### 2.9.3. Business Development Agents

As part of the Induction Process, new Business Development Agents will be made familiar and understand the ABC Policy.

Business Development Agents will receive anti bribery and corruption training at least annually and reminded of the reporting process.

## 2.10. Agents and Suppliers

### 2.10.1. Audits

Agents and Suppliers will be required to answer a questionnaire as part of their on-boarding process which includes matters relating to ABC. This questionnaire forms the basis of an ABC Audit on the individual. See Vendor On boarding Process.

### 2.10.2. Payments

Payments made to agents and consultants must be commensurate to the services they provide or they risk being considered an improper payment.

Consultants/Employees must report any suspected improper payments immediately to a member of the senior management team.

### 2.10.3. Breaches

If a supplier breaches Salama Fikira ABC policy, actions will be taken in accordance with the Consequence Management Policy.

## 2.11. Activities in Low Ranking Countries

During the course of Salama Fikira normal business it is usual to operate in support of clients in countries which are low ranked in the world Corruption Perception Index.

When operating in these Low Ranking Countries (LRCs) employees and consultants must have received ABC training and be familiar with the Whistleblower policies.

As part of their pre-deployment briefing they will confirm they are familiar with and comply with the Company ABC policy in addition to any other declaration or formal notification which they may have undertaken previously.

Operations will be planned by individuals who have had training in ABC and where it is feasible operations will be planned to avoid scenarios which are likely to encourage corrupt activity

Low Ranking Countries which are defined as Countries which are assessed by Transparency International to have a higher perceived risk of corruption than those in which Salama Fikira is registered and operates in.

Signed:



**Crispin Kennedy**

Chief Operating Officer

Salama Fikira Group

12 January 2022