



Zawawi Powertech Engineering LLC

PO Box: 3159, PC 111, CPO, Sultanate of Oman.
Tel: (+968)-24070200 Fax: 24070300

ZPTE Anti-Bribery and Anti-Corruption Policy (ABC Policy)

ZPTE operates with various Vendors, Clients, its employees, and the third parties we engage are subject to various ABC laws Act, Any incident of bribery and corruption involving ZPTE employees and/or any breach of any applicable ABC law will damage our business and our reputation. It may also result in severe criminal, civil and regulatory penalties for ZPTE and any individuals involved in bribery and corruption.

ABC Policy Details.

Bribery/Corruption: Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.

Conflict of Interest: This occurs when an individual or organization is involved in multiple interests, one of which could be possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

Employee: For the purposes of this policy this includes all individuals working at all levels at all ZPTE entities and affiliate businesses, whether permanent, fixed term or temporary.

Facilitation Payment: A facilitation or "grease" payment is a payment, generally of low value, made to a government or regulatory official to facilitate or expedite a routine, nondiscretionary government or controlled activity that the official is required to perform as a matter of course.

Kickback: A bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.

Money laundering: Means the process of hiding the origin of money obtained through crime (the "proceeds of crime") within lawful business activities and also describes the use of any money to fund terrorism.

Public Official: Officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

our integrity is non-negotiable. We do not tolerate bribery of any kind - and we will not knowingly facilitate any other party's corrupt conduct. Our guiding principles for antibribery and anti-corruption, explained in-depth below, dictate core musts and must-nots.



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Maintain accurate books and records. You must fairly and accurately represent how we utilise company resources, in accordance with ZPTE policies on expenses, records retention, information security, gifts and hospitality and other relevant policies.

You must never provide or promise to provide anything of value to a third party to improperly influence a decision on their part. You may provide or accept gifts, meals, travel, entertainment and other items of value only when this is proportionate, appropriate and in compliance with our relevant policies and procedures. You must never solicit any item of value from any third party.

Gifts or hospitality may only be offered or accepted in very limited circumstances and prior approval must be attained. An assessment will be made regarding whether the gift or hospitality is being received in a business context and are within industry norms. Breach of this policy will be taken seriously and may result in disciplinary action against the relevant employees.

It is an offence to bribe a government or a public official. Bribery occurs when an individual offers, gives, solicits, or receives any item of value as means of influencing the actions of an individual holding a public or legal duty. ZPTE adopts a zero-tolerance policy towards bribery, and any giving or receiving of benefits from or to government officials is strictly prohibited unless prior authorisation and approval has been obtained

You must report any demands for facilitation payments immediately, whether the demand is made directly or indirectly, or if you learn of a demand or payment made by a third party acting on ZPTE behalf.

Employees have a duty to avoid financial, business, or other relationships with Vendors / Contractors, that might be opposed to the interests of ZPTE or that might interfere with the proper performance of their duties, responsibilities, or loyalty to ZPTE.

The ZPTE Managing Directors is responsible for the design and overall effectiveness of the controls to manage risks of bribery and corruption.

Everyone at ZPTE , without exception, must: Familiarize themselves with and act at all times in full compliance with the this policy,

Never offer, promise, make or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage;



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Remember that the giving and receiving of gifts, entertainment or anything else of value might bear bribery and corruption risks and hence should only be provided or received in accordance with ABC policy, as well as any applicable ABC laws;

take extra precautions when dealing with the government officials and employees of government-owned entities, as even tiny perceptions of attempted influence over decisions of these officials and employees may be subject to further scrutiny by local and international authorities;

Not make directly or indirectly, political contributions of any kind in the name of ZPTE ; and

Ensure that the social contributions and charitable donations provided to support the communities and societies in the countries of operation do not amount to, and cannot be perceived as bribery or corruption, and are only made in conformance with ABC procedures and guidance, as well as any applicable ABC laws.

Objectives

To meet this commitment at a Group level, ZPTE will:

Update the Standard for Prevention of Bribery and Corruption where necessary, and develop relevant Group procedures and guidance to support the effective implementation of this policy; and

Periodically review the suitability and effectiveness of this policy, the associated standards, procedures, systems and system level controls, and amend them as necessary.

Each Head of a Business Unit or Function at ZPTE will take the necessary steps to:

Develop, update and maintain Business Unit and functional level procedures to support the effective implementation of this policy, Group level procedures or to address risks specific to their respective Business or Function;

Make sure all employees in their Business Unit or Function are aware of all ABC policies, standards, laws and regulations applicable to them and received an adequate training;

Ensure that sufficient resources, personnel, tools and systems are in place to support the effective implementation of this policy;

If you are not sure about what action to take, or if the assurances are not adequate, you should report your concerns immediately to the MD Office.

Sincerely,

S.PERIYASAMY


MANAGING DIRECTOR
ZAWAWI POWERTECH ENGINEERING L.L.C

