

DATED

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ANTI-BRIBERY PROCEDURES



Anti-Bribery and Corruption Procedures

1. Hayat Construction Limited trading as TrentENERGY (“TE”) is committed to operating with the highest standards of integrity, honesty and fair dealing. The general principles underlying this commitment include zero tolerance of bribery and corrupt practice.

Bribery Act 2010

2. A bribe is defined as an inducement or reward that is offered or provided in order to gain a commercial, contractual or personal advantage.
3. There are four main offences: giving a bribe; receiving a bribe; bribing a public official; and a new offence of a commercial organisation failing to prevent bribery by an associated person. An associated person includes trustees, employees and volunteers and may include people over whom TE has little control such as agents, intermediaries and suppliers.
4. Penalties for committing an offence include criminal penalties for individuals (who can be jailed for up to 10 years or receive an unlimited fine) and organisations (which can receive unlimited fines). Senior officers of an organisation can also be convicted where they have given their consent or have done nothing to stop an act of bribery.
5. The Act provides a defence to the new offence of failure to prevent bribery if the organisation can prove it had adequate procedures in place to prevent bribery. Such procedures are to be based on six principles: proportionate procedures, top level commitment, risk assessment, due diligence, communication and training, and monitoring and review.
6. The following procedures are based around these six key principles. They apply to trustees and employees and, as appropriate, to volunteers.

Top level commitment

7. These procedures have been reviewed and approved by, and come with the full commitment of the Board of TE. Any failure by employees to comply with the procedures will be treated as a disciplinary offence and, in the case of bribery, may put them at risk of criminal prosecution.

8. Incidents involving actual, potential or attempted bribery must always be reported to a member of the senior management team.

Risk Assessment

9. TE keeps under review the organisation's risk profile and at least annually will make an assessment of the level and extent of potential bribery risks that the organisation faces. These procedures will be reviewed and amended as appropriate to take account of any changes that are identified through this assessment.

Due Diligence

10. Due diligence is relevant primarily to persons who perform services on behalf of TE.
11. Employees: pre-employment processes should include checking of references and verifying qualifications.
12. Agents/third parties: appropriate checks should be carried out before engaging individuals/organisations where they may be in a position to engage in acts of bribery on behalf of TE. These will include background checks and multiple references. Selection should be by way of a competitive tender process.
13. Acquisitions/mergers: due diligence should seek to identify anti-bribery policies and procedures that operate in the 'target' and whether they have a track record of unethical behaviour such as bribery.

Communication and Training

14. All employees and volunteers will be provided with a copy of these procedures and be required to confirm in writing that they have read and understood them and agree to comply with them.
15. Employees will be regularly reminded of their obligation to raise concerns about bribery through their manager.
16. These procedures will be available on the TE intranet and will be made known to all associated persons at the time of their engagement.

Monitoring and Review

17. The operation of these procedures will be reviewed annually by the Board on their continued effectiveness and any amendment required thereto.
18. Specific procedures relating to:
 - a) **Facilitation payments** These are typically small, unofficial payments made to secure or speed up a routine government action that a government official is obligated to perform. (They do not include legally required administrative fees and legitimate fast-track services) Facilitation payments are unlawful and should not be made.
 - b) **Gifts and Hospitality** These can range from small gifts (such as diaries) to expensive hospitality (tickets for major events). No gifts, entertainment or hospitality shall be accepted by trustees, employees or volunteers in the course of their employment or association with TE in circumstances where it could be regarded as likely to influence the outcome of any business transaction or impact an individual's judgement. Gifts, entertainment and hospitality may only be accepted if they are infrequent, reasonable, proportionate and of modest value. No cash or cash equivalents (e.g. vouchers) must be accepted or offered. In the case of entertainment or hospitality, the provider of the entertainment or hospitality must be present. No gifts, entertainment or hospitality shall be made to or accepted from public or government officials. No political donations should be made in any circumstances (including to a political party, a politician or a political campaign).