



شركة غرب القرنة
West Al Qurna Co.

Oil & Energy | للنفط والطاقة

E.P.C

ANTI-BRIBERY AND CORRUPTION POLICY



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WEST AL-QURNA for Oil and Energy Services L.L.C.

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ANTI-BRIBERY AND CORRUPTION POLICY

1. Introduction

WEST AL-QURNA for Oil and Energy Services L.L.C. ("the Company") is committed to operating with the highest standards of integrity, ethics, and transparency. In alignment with international regulations and ethical expectations, including **ISO 37001** (Anti-Bribery Management System), this Anti-Bribery and Corruption Policy outlines our zero-tolerance approach to bribery and corruption. It applies not only within the Company but also to all our interactions with external entities.

Bribery and corruption are serious crimes that can result in severe legal penalties and irreparable reputational harm. Our stance is clear: **WEST AL-QURNA** will not tolerate any form of bribery or corruption, either within the organization or in any external engagements.

2. Purpose and Objectives

The purpose of this policy is to:

- Define bribery and corruption and raise awareness of the associated risks;
- Set clear rules, responsibilities, and expectations for ethical conduct;
- Prevent, identify, and respond to bribery and corruption risks;
- Ensure compliance with international anti-corruption laws and **ISO 37001**;
- Promote a unified culture of transparency and accountability.

3. Scope of the Policy

This policy is binding for:

- All Company employees, including permanent, temporary, and contract staff;
- Company owners, board members, and senior executives;
- Agents, intermediaries, consultants, and third-party representatives;
- All vendors, suppliers, manufacturers, and strategic partners engaging with the Company.

All parties are expected to familiarize themselves with and adhere strictly to the standards outlined in this document.



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4. Definitions

Bribery: Offering, promising, giving, soliciting, or receiving any item of value to gain an unfair business advantage.

Corruption: Abuse of entrusted power for private gain, including activities such as embezzlement, favoritism, extortion, and collusion.

Facilitation Payments: Small, unofficial payments made to expedite routine administrative processes. These are expressly forbidden under this policy.

Third Parties: Any individual or organization acting on behalf of or providing goods/services to **WEST AL-QURNA**, including agents, consultants, and joint venture partners.

5. Policy Principles

- **Zero Tolerance:** Bribery and corruption in any form are categorically prohibited.
- **Due Diligence:** Risk-based due diligence must be conducted on third parties before engagement.
- **Gifts and Hospitality:** Must be modest, infrequent, and never intended to improperly influence a decision.
- **Political Donations:** Prohibited under all circumstances.
- **Charitable Contributions:** Must be transparent, documented, and approved by senior management.
- **Facilitation Payments:** Not permitted, regardless of cultural norms or pressures.

6. Responsibilities of External Parties

All vendors, suppliers, manufacturers, contractors, and partners are expected to:

- Read, understand, and formally acknowledge this Anti-Bribery and Corruption Policy;
- Conduct business with integrity and uphold anti-bribery laws in all transactions;
- Ensure their staff and subcontractors are trained and compliant with these standards;
- Promptly report any concerns or suspicions of unethical conduct.

Failure to comply may result in contract termination, removal from approved supplier lists, and legal action.



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7. Reporting Violations

All employees and external stakeholders are encouraged to report suspected violations in good faith. Reports can be submitted:

- Directly to management or compliance personnel;
- Via confidential written communication;
- Through future anonymous reporting channels to be developed.

WEST AL-QURNA commits to:

- Thoroughly investigating all reports;
- Ensuring protection from retaliation for whistleblowers;
- Taking appropriate corrective and disciplinary action.

8. Disciplinary Action

Violations of this policy will lead to consequences proportionate to the severity of the offense, including:

- Verbal or written warnings;
- Suspension or dismissal from employment or contract;
- Legal prosecution and notification to relevant authorities.

9. Communication and Training

This policy will be distributed to all internal and external stakeholders. As part of our ongoing compliance program:

- New employees will receive training during onboarding;
- Periodic training and refresher sessions will be held;
- Vendors and partners will be briefed during engagement processes.



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10. Responsibilities and Oversight

Management is responsible for:

- Enforcing the policy and monitoring adherence across departments and partnerships;
- Leading by example in all business dealings;
- Investigating allegations and reporting outcomes transparently.

All employees and third parties are expected to support ethical conduct and report concerns responsibly.

11. Commitment to Continuous Improvement

WEST AL-QURNA will regularly review and enhance its anti-bribery program by:

- Conducting risk assessments and internal audits;
- Implementing anonymous whistleblower mechanisms;
- Strengthening internal controls and record-keeping;
- Encouraging a culture of continuous learning and integrity.

12. Legal and Regulatory Alignment

This policy aligns with local and international anti-corruption laws, including:

- The United Nations Convention against Corruption (UNCAC);
- The U.S. Foreign Corrupt Practices Act (FCPA);
- The UK Bribery Act 2010;
- **ISO 37001**: Anti-Bribery Management Systems.

All parties must comply with these legal frameworks in addition to this policy.



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13. Record-Keeping and Monitoring

All expenses, gifts, and hospitality must be:

- Accurately recorded in the Company's books;
- Subject to audit and review by internal or external auditors;
- Retained in accordance with financial and legal regulations.

Tampering with records or failure to disclose is a serious violation and will be treated accordingly.



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14. Appendix A – Gift and Hospitality Approval Form

WEST AL-QURNA for Oil and Energy Services L.L.C.

Gift and Hospitality Approval Form

| Section | Details |
|---|--|
| Name of Employee or Third Party | |
| Department / Affiliation | |
| Date of Request | |
| Description of Gift/Hospitality | |
| Estimated Value | |
| Purpose/Justification | |
| Offered to/from (Name & Organization) | |
| Business Relationship | |
| Event/Occasion | |
| Is this during procurement/negotiation? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| CEO's Comments | |
| Approved by (Name/Signature) | |
| Date of Approval | |

Instructions:

- Complete this form before accepting or giving gifts or hospitality;
 - Submit to a department head or compliance officer for authorization;
 - Attach documentation (e.g., invitations, receipts);
 - Keep for record-keeping and compliance audit purposes.
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Approved by:



CEO

Eng. Firas Younus Salman

WEST AL-QURNA FOR OIL & ENERGY SERVICES L.L.C

Date: 05/01/2025