



# ANTI-BRIBERY, CORRUPTION AND MONEY LAUNDERING POLICY

## 1.0 PURPOSE

The purpose of this statement is to communicate the Company's stance on anti-bribery, corruption and money laundering to which its employees are expected to recognise and adhere, regardless of the country in which they work.

All employees must comply with the provisions of this policy, the UK Bribery Act 2010, the Foreign Corrupt Practices Act, 18 USC Section 201, the Shaw Pipeline Services (SPS) Code of Conduct at all times and any other relevant location legislation.

It is Company policy to conduct all of our business in an honest and ethical manner. The Company takes a zero-tolerance approach to bribery, corruption and money laundering and are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

Any employee who breaches this policy may face disciplinary action on the grounds of gross misconduct, which could result in summary dismissal. Any agency worker or contractor who breaches this policy may have their contract terminated with immediate effect.

## 2.0 SCOPE

This statement applies to all SPS employees and other persons acting on behalf of the Company regardless of geographic location. The following companies are included;

- Shaw Pipeline Services UK Ltd (UK)
- Shaw Pipeline Service Inc. (US)
- Shaw Pipeline Services Ltd (Canada)

In addition, SPS expects its all of operational business partners and suppliers/vendors to support and comply with this statement and its underlying principles.

## 2.1 TERMS USED

The term employee is used in this context for administrative convenience and intentionally captures a wider group of individuals and/or companies than the traditional definition of employees. The determination of who is and is not an "employee" is fact specific and must be determined in accordance with the local labour laws.

## 3.0 UNDERSTANDING BRIBERY

**Bribe:** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

**Bribery:** includes offering, promising, giving, accepting or seeking a bribe.



# ANTI-BRIBERY, CORRUPTION AND MONEY LAUNDERING POLICY

All forms of bribery are strictly prohibited. If employees are unsure about whether a particular act constitutes bribery, they should raise it with their Line Manager or a member of higher-level management.

Specifically, employees must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that they know or suspect is made with the expectation that the Company will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

Employees must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## 4.0 MONEY LAUNDERING

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds, so that the proceeds appear to have been derived for legitimate origins or constitute legitimate assets.

## 5.0 GIFTS AND HOSPITALITY

The Company's business decisions are made on merit, and employees must not accept gifts from either customers or suppliers if it would put any sense of obligation on the employee to give the customer or supplier more favourable treatment. Any gift of significant value should be reported to the employee's supervisor. Employees must not accept or request kickbacks or payments for their personal benefit from customers or suppliers.

Employees must not give or offer, directly or indirectly, anything of value to a customer or government official to influence or reward an action.

A business favour, such as a gift, contribution, or entertainment, must not be offered under circumstances that might create the appearance of impropriety. In appropriate circumstances, employees may provide existing or potential customers with reasonable entertainment or gifts. However, the gifts must be permitted by local law, the customer's own policies and the employee's business unit's policies.

## 6.0 RECORD-KEEPING

Employees must declare and keep a written record of all hospitality or gifts given or received. They must also submit all expense claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.



# ANTI-BRIBERY, CORRUPTION AND MONEY LAUNDERING POLICY

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers, should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

## 7.0 HOW TO RAISE A CONCERN

If an employee is offered a bribe, or are asked to make one, or if they suspect that any bribery, corruption, money laundering or other breach of this policy has occurred or may occur, they must notify their Line Manager or a member of higher level management or report it in accordance with the Company Whistleblowing Policy as soon as possible.

## 8.0 AMENDMENTS TO POLICY

The Company reserves the right to make amendments to this policy in line with legislative changes or Company decisions.

## 9.0 RELATED POLICIES

PO-HRGL-001 – SPS Global Code of Conduct

PO-HRGL-005 – SPS Whistleblower Policy