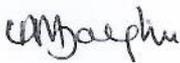


Nigerdock Nigeria PLC- FZE

Anti-Bribery Compliance Policy And Guidelines

Document Number: ND-HR-POL-0007

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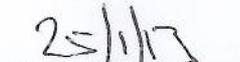
ANTI-BRIBERY COMPLIANCE POLICY

Nigerdock Nigeria PLC FZE does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in its business dealings, anywhere in the world, both with public officials and the private sector.

Nigerdock is committed to the following principles:

- Carrying out business fairly, honestly and openly.
- Not giving or offering any money, gift, hospitality or other advantage to any person carrying out a business role, or to a third party associated with that person, to get them to do something improper, unethical or against Company policy.
- Not giving or offering any money, gift, hospitality or other advantages to any public official with the intention of influencing them to the Company's business advantage.
- Not using intermediaries or contractors for the purpose of committing acts of bribery.
- Not allowing employees to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.
- Avoiding doing business with others who do not commit to doing business without bribery.
- Commitment to programmes that counter the risk of the Company being involved in bribery through existing detailed policies and procedures protecting against this.
- Any employee found to be in breach of these principles shall face disciplinary action.
- No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in the Company losing business.
- Any concerns relating to a breach of this policy should be reported to the Managing Director.


Christopher Bennett


Dated

Managing Director
Nigerdock Nigeria PLC FZE

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ANTI-BRIBERY COMPLIANCE GUIDELINES

1 Introduction to the Guidelines

- 1.1 These Guidelines are intended to ensure that Nigerdock Nigeria PLC FZE's ("Nigerdock") businesses; Employees and Service Providers do not breach the UK Bribery Act 2010, the US' Foreign Corrupt Practices Act, and International anti-bribery laws.
- 1.2 The Anti-Bribery Compliance Policy & Guidelines apply to Nigerdock's directors, officers and employees (referred to as "Employees").
- 1.3 We will endeavour to ensure that people and businesses who perform services for us, for example, agents, contractors, consultants, advisers and freight forwarders (referred to as "Service Providers") when acting on Nigerdock's behalf, and all companies or entities who we enter into a joint venture, consortium or similar relationship with (referred to as "Joint
- 1.4 Venture Partners") when conducting business in partnership with Nigerdock comply with our anti-bribery principles. The Anti-Bribery Compliance Policy & Guidelines apply irrespective of the country in which business is being conducted. Where there are differences between the local law and these Guidelines, you must apply either these Guidelines or the local law, whichever sets the highest standard of behaviour.

2 What is Bribery and Corruption?

- 2.1 Bribery is the offer, promise, giving, requesting or acceptance of a thing of value as an inducement for doing something improper in carrying out work or performing a public function.
- 2.2 Corruption is the misuse of public office or a business position for private gain.
- 2.3 Acts of bribery or corruption are designed to influence an individual in the performance of their duties and to act in a way contrary to how their employer, their organisation or the public would expect them to act.
- 2.4 The person being bribed is generally someone who will be able to obtain, retain or direct business; or who can help Nigerdock with an administrative or legal process. This may involve but is not limited to securing contracts, machinery or land; or the handling of legal or administrative tasks such as licences, planning, customs, taxes, or import/export matters.

3 What is a Bribe?

- 3.1 A bribe is anything of value which is given to get someone to do something wrong or, in respect of public officials, to influence them to Nigerdock's business advantage. Bribes usually take the form of improper payments or personal "commissions". They can, however, take on many different shapes and forms, such as gifts, loans, holidays, reimbursement of travel and other expenses, grease or dash payments, secret rebates, charitable or political donations, job offers, scholarships, and excessive hospitality.

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4 Why are the Policy and Guidelines Important?

- 4.1 Bribery is a criminal offence in most countries in which Nigerdock does business, and the penalties can be severe, including imprisonment of individuals, significant fines and seizure of money derived from contracts tainted by bribery.
- 4.2 Nigerdock does business with International companies, including from the EU, UK and US, who are subject to strict anti-bribery laws and who could be liable if Nigerdock does not prevent bribery in connection with the services provided to them by Nigerdock. International companies will not wish to do business with Nigerdock unless there is a robust stance against bribery by Nigerdock hence these Anti-Bribery Compliance Policy & Guidelines are therefore important for Nigerdock's business.
- 4.3 Nigerdock wishes to guard against deliberate and also accidental breaches of bribery laws.

5 What is expected of you?

- 5.1 All Employees must read and observe the requirements of the Anti-Bribery Compliance Policy & Guidelines. Employees must also act with honesty and integrity and comply with all applicable laws, whether or not specifically covered by the Anti-Bribery Compliance Policy & Guidelines or any other Nigerdock policy.
- 5.2 The Managing Director is responsible for the day-to-day oversight of the Anti-Bribery Compliance Policy & Guidelines and for approving contracts with Service Providers.
- 5.3 Managers and support employees should work to create an environment that encourages compliance with the Anti-Bribery Compliance Policy & Guidelines. Supervision of responsible business practices is as important as supervision of performance. You should encourage those you manage to report any concerns and to ask any questions they have regarding bribery or corruption issues.
- 5.4 Service Providers and Joint Venture Partners - we expect and encourage our Service Providers and Joint Venture Partners to adhere to Nigerdock's Anti-Bribery Compliance Policy & Guidelines. Service Providers and Joint Venture Partners must also act with honesty and integrity and comply with all applicable laws, whether or not specifically covered by the Anti- Bribery Compliance Policy & Guidelines or any other Nigerdock policy.
- 5.5 These Guidelines cannot address every conceivable situation. In many circumstances, the law or the Anti-Bribery Compliance Policy & Guidelines will clearly dictate what you should do, but on other occasions the situation will require the exercise of reasonable judgement depending on each peculiar circumstance. Always err on the side of caution.

6 Service Providers

- 6.1 Service Providers are people and businesses who render services to Nigerdock, for example, agents, contractors, consultants, advisers and freight forwarders etc.
- 6.2 Service Providers must be carefully selected, subject to a written and duly executed standard contract and shall be properly monitored.
- 6.3 Neither Nigerdock nor its Service Providers shall pay any consultancy fees to public officials, employees or contractors of private sector businesses or public bodies to whom they tender or seek to do business with.

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6.4 All existing Service Providers should be provided with a copy of Nigerdock's Anti-Bribery Compliance Policy & Guidelines and shall comply with Nigerdock's anti-bribery stance.

6.5 Selection and Verification of Service Providers

6.5.1 A legitimate need for the services must be clearly identified in advance of requesting the services and entering into arrangements with the prospective Service Provider. All fees and commissions paid to Service Providers who act for or on behalf of Nigerdock must be legal, proportionate and objectively justified.

6.5.2 Nigerdock adopts a "**risk based**" approach to the selection and verification of Service Providers. The categories of risk are as follows:

a) Low risk service providers include third parties that:

- i. are not required to liaise with government officials on Nigerdock's behalf or who are not used to assist Nigerdock with securing business, contracts or any advantage in the course of business. For example, our office cleaners, security guards, taxi providers and suppliers would be considered to be low risk; or
- ii. (ii) are part of a well known international firm which operates in a regulated sector (e.g. lawyers, accountants) within Nigeria (for example, KPMG); or
- iii. (iii) are part of a regulated firm which only operates in a country with a Transparency International Corruptions Perceptions Index ("TICPI") (www.transparency.org/policy_research/surveys_indices/CPI/2010/results) score of 6 or more

b) Medium risk service providers include third parties:

- i. operating within countries with a score from four to six on the TICPI; and
- ii. who are connected to a government body in any jurisdiction; or
- iii. who provide Nigerdock with freight forwarding services and/or customs brokers, logistics and shipping providers; or
- iv. who liaise with government officials on behalf of Nigerdock for the purpose of seeking necessary consents and licenses; or
- v. who assist Nigerdock with securing business, contracts or an advantage in the course of business.

c) High risk service providers include third parties:

- i. operating within countries with a score of less than four on the TICPI (note: Nigeria's score is 2.4); and
- ii. who are connected to a government body in any jurisdiction; or
- iii. who provide Nigerdock with freight forwarding services and/or customs brokers, logistics and shipping providers; or
- iv. who liaise with government officials on behalf of Nigerdock for the purpose of seeking necessary consents and licenses; or

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- v. who assist Nigerdock with securing business, contracts or an advantage in the course of business.

6.5.3 A different level of verification and due diligence is required depending on whether a service provider represents a low, medium or high risk of bribery.

- a) Before contracting with a low risk service provider you should speak with colleagues and conduct internet research to determine the reputation and standing of the service provide
- b) Before contracting with a medium risk service provider you should carry out the steps above for low risk service providers and also:
 - i. Provide the Service Provider with a copy of Nigerdock's Anti-Bribery Policy & Guidelines; (ii) Insert an anti-bribery contract clause in the contract with the Service Provider and ask them to confirm that they will comply with it;
 - ii. Ask the Service Provider to complete a due diligence questionnaire (**Appendix 1**) and return it to the Managing Director's P.A. ; and
 - iii. Where the completed due diligence questionnaire raises further concern you should speak with the Managing Director about further due diligence.
- c) Before contracting with the higher risk Service Providers you should:
 - i. carry out the above steps for low and medium risk service providers too;
 - ii. carry out credit checks;
 - iii. meet the prospective Service Provider for a face-to-face interview; and
 - iv. if the completed due diligence questionnaire, credit check or meeting raises further concern you should speak with the Managing Director about further due diligence.

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6.6 Contractual Controls for Service Providers

6.6.1 A written contract must be agreed in advance of the commencement of the services which specifies the nature of the services to be provided and the basis for payment for those services. Any agreement with a Service Provider must contain anti-bribery wording. You should contact Lanre Fagbohun for help with appropriate wording to use/drawing up the contract.

6.6.2 There may be Service Providers who are already engaged on contracts which do not include anti-bribery clauses. Such Service Providers should be given a copy of Nigerdock's Anti-Bribery Compliance Policy & Guidelines and asked to confirm in writing that they will comply with them. At the next opportunity to review or break Nigerdock's contract with the Service Provider, the Service Provider should be informed that they will need to enter a new form of contract containing anti-bribery wording.

6.7 Monitoring of Service Providers

6.7.1 **Invoices and receipts** - the services provided and payments made to and by Service Providers should be monitored. A receipt or invoice should be provided by the Service Provider, which should set out in reasonable detail the goods, services or expenses for which payment is requested. All receipts and invoices should be scrutinised by the member of Staff who receives the receipt or invoice and by the person who approves the payment.

6.7.2 **Red flags** - Staff should look out for bribery "red flags" (see **Appendix 2**). Any red flags should be reported immediately to the Managing Director.

7 Public Officials

7.1 Payments and things of value given to "public officials" in connection with Nigerdock's business expose Nigerdock to a greater risk of being accused of engaging in bribery. You must take extra care when interacting with public officials. A public official is any person who exercises a public function for or on behalf of a government, a government agency, or a local or public authority; a politician or a candidate for political office; a person who works for a public international organisation (for example, the United Nations or World Bank); an official exercising any public function in a state-owned company and any person, whether elected or appointed, who holds a legislative, administrative or judicial position of any kind.

8 Gifts and Hospitality

Gifts and hospitality given or received by Staff and Service Providers must:

- **be within the bounds of recognised business practice**
- **not be intended to influence improperly a business relationship or transaction**
- **not be in cash.**

8.1 We need to be careful with the gifts and hospitality given and received by Staff and Service Providers in connection with Nigerdock's business, whether to people in the public or private sector. It is important that any suggestion of impropriety is avoided. The guidelines below are intended to protect our Staff and Service Providers from any allegation of giving improper gifts or hospitality.

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Gifts

- 8.2 Staff and Service providers are generally not permitted to accept gifts in connection with Nigerdock's business. If, under extraordinary circumstances, it is not practical or would cause embarrassment to refuse to accept a gift, the gift may be accepted, but must be reported and delivered to the appropriate [Head of Department].
- 8.3 Gifts may be given by Staff or Service Providers as a token of goodwill, a courtesy, or to promote Nigerdock's brand. Such gifts should generally bear the Nigerdock logo or trademark and should be nominal in value. Cash gifts are not acceptable.
- 8.4 It is extremely important that a gift or payment must not be given to influence any business decision or act or decision of a government or public official in his or her official capacity.
- 8.5 All gifts given and received by Staff in connection with Nigerdock's business must be recorded in Nigerdock's Gifts, Hospitality and Expenses Register.

Hospitality

- 8.6 Hospitality may be defined as anything beyond the offer of non-alcoholic drinks and light refreshment. Hospitality given or received by Staff or Service Providers in connection with Nigerdock business must:
- **be reasonable** - it should not be excessive or lavish
 - **not be intended to influence a business transaction** - the hospitality should not place the recipient under any obligation and should not be capable of being misconstrued
 - **be allowed by law** - governments and public authorities often have laws or Codes of Practice which prohibit the receipt of hospitality by public officials. The provision of lunch or refreshments ancillary to a meeting should not contravene such a prohibition, but the provision of entertainment or attending a sporting event may do.
- 8.7 All hospitality given and received by Staff in connection with Nigerdock's business must be recorded in Nigerdock's Gifts, Hospitality and Expenses Register.

9 Travel and Business Expenses

- **Staff and Service Providers may reimburse third parties for reasonable travel, accommodation, food and refreshment expenses which are directly related to a meeting, the execution or performance of a contract, or some other legitimate business purpose.**
 - **Staff and Service Providers should not pay excessive expenses or the expenses of a third party's relative, spouse or partner.**
- 9.1 There may times when a business person or public official is required to travel to attend a meeting relating to Nigerdock or in connection with a Nigerdock business. In certain circumstances it may be appropriate for Nigerdock or a Service Provider to pay for the individual's reasonable travel, accommodation, food and refreshment expenses.
- 9.2 Staff and Service Providers may pay for the reasonable costs of an individual's travel, accommodation, food and refreshment expenses if, and only if, the expenses are necessary and

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ancillary to a meeting, the execution or performance of a contract, or some other legitimate business purpose. The expense must not be capable of being construed as influencing the individual in his or her decision making.

- 9.3 If possible, expenses should be paid directly from Nigerdock or the Service Provider to the organisation which the business contact or public official works for, or Nigerdock should arrange the travel and accommodation, rather than reimbursing the individual directly. The amount of the expenses should be reasonable and based upon receipts. **Cash payments should not be made.**
- 9.4 All expenses reimbursed in connection with Nigerdock's business must be recorded in Nigerdock's Gifts, Hospitality and Expenses Register.

Travel

- 9.5 What amounts to "reasonable" expense will vary according to the circumstances and to the country in question. It will generally be reasonable to pay for business class travel. Travel above this level will need to be objectively justified (for example, due to the length of distance to be travelled or lack of availability of economy seats). In no circumstances, should you offer or provide travel to a relative, spouse or partner of the business person or public official.

Accommodation

- 9.6 What amounts to "reasonable" expense will vary according to the circumstances and to the country in question. Clean, comfortable, secure and convenient accommodation should be provided. In some countries this may mean providing accommodation in a five star hotel, although usually a three or four star hotel should suffice. Renowned or extravagant hotels or hotels known for their luxurious entertainment should be avoided.
- 9.7 In no circumstances should you offer or provide accommodation to a relative, spouse or partner of the business person or public official. You should also not pay for accommodation for more than one or two nights after the meeting or visit, unless exceptional circumstances arise.

10 Facilitation Payments

- 10.1 Nigerdock makes no distinction between bribes and so-called "facilitation", "grease" or "dash" payments to speed up or procure a transaction or administrative process (for example, customs clearance).
- 10.2 Staff and Service Providers must not make facilitation payments in connection with Nigerdock's business. The **only exception** to this would be in circumstances where there is a **real and imminent threat to the health, safety, personal security or welfare** of any member of Staff or Service Provider or a member of his or her family. An example of this would be where a Customs Official makes a demand for payment together with a threat that if payment is not made, the person may be detained.
- 10.3 If you decide to make a payment due to such a threat, this exceptional circumstance must be reported immediately and followed up in writing to your Manager. The payment must be accurately recorded as an "Extortion Payment". The Head of Department should report the payment to the Managing Director so that remedial action can be taken.

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11 Political Contributions and Events

- **Nigerdock supports good and stable government. Nigerdock does not support individual politicians or officials.**
- **Nigerdock does not make contributions to political parties, organisations or individuals engaged in politics as a way of obtaining an advantage in business.**

11.1 Care must be taken in supporting events and other activities of government, local authorities, political parties or organisations, individuals engaged in politics and public officials. Such support must not be perceived to exert any improper influence. There needs to be a legitimate business reason for supporting any such event or activity and the amounts involved should be reasonable. Any payment to attend such an event must be made to a political party or organisation rather than to an individual politician, public official or candidate for political office. Any attendance at or support of political events, conferences or dinners by Staff must be pre-approved in writing by [].

11.2 This policy does not prevent any individual from choosing in a personal capacity to join, support or make a donation to a political party provided that it is done in such a way that there is no connection with Nigerdock, and that in the circumstances it could not reasonably be perceived by others as being a donation or involvement by the company, or for business advantage.

12 Charitable Donations

- **Charitable contributions and sponsorships must not be used as a means for bribery.**
- **Service Providers are not permitted to make any charitable contributions in connection with Nigerdock business.**

12.1 While Nigerdock is keen to support charities, particularly those in the communities it operates, donations to charity can be used as a means of paying bribes. Donations should only be given to reputable, legitimate and registered charities.

13 Bookkeeping and Accounting

13.1 Books, records and accounts must be kept which accurately and fairly reflect all domestic and foreign transactions.

13.2 If you have knowledge of any unrecorded transaction or any mischaracterised record or accounting, register or bookkeeping entry, you must report it as soon as possible to [].

13.3 Staff and Service Providers must not make, approve, or process any payment which relates to a Nigerdock business with the intention, understanding or suspicion that any part of the payment is to be used for any purpose other than that described by the documents supporting the payment.

13.4 Examples of prohibited record keeping activities include:

- a) making records appearing to show a payment to one person when, in fact the payment was made to, or intended for, someone else
- b) submitting inaccurate expenses

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- c) records that inaccurately characterise or inaccurately describe the true nature of transactions or payments (for example, recording a bribe as a "commission" or "marketing expense", or a payment as an "overhead expense" instead of a "commission")
- d) claims for services, products or equipment not received
- e) creating or maintaining any unrecorded funds or assets of the company, including unrecorded "petty cash".

14 Reporting Suspected Non-Compliance

- 14.1 Members of Staff must report any breaches or potential breaches of the Anti-Bribery Compliance Policy & Guidelines as soon as possible. You can report your concerns to your Manager, or to the Managing Director.
- 14.2 Any Service Provider who suspects or is aware of any violations of Nigerdock's Anti-Bribery Compliance Policy or Guidelines must immediately notify their Nigerdock contact.
- 14.3 Nigerdock will take all reported concerns seriously and will confidentially investigate to determine if the law or the Anti-Bribery Compliance Policy & Guidelines have been contravened.
- 14.4 Any person who, in good faith, reports suspected legal, ethical or policy breaches will not suffer any adverse consequences for having done so.
- 14.5 If you report a suspected breach or bribery concern, Nigerdock will make every effort to keep your identity private.

15 Consequences of Non-Compliance

- 15.1 Nigerdock may take appropriate disciplinary action, up to and including termination of employment, against any member of Staff who fails to comply with the Anti-Bribery Compliance Policy & Guidelines, or applicable laws. In addition, a member of Staff who breaks the law may be reported to the police and may face criminal proceedings, fines or imprisonment.
- 15.2 For Service Providers and Joint Venture Partners, non-compliance with the Anti-Bribery Compliance Policy & Guidelines and any applicable laws will be considered to be a material breach of contract and may result in the termination of any relationship with Nigerdock and the matter being reported to the police.

16 Who can I contact if I have any questions?

- 16.1 If you have any questions query about anything in Nigerdock's Anti-Bribery Compliance Policy and Guidelines or about any bribery or corruption issue which is not covered in Nigerdock's Anti-Bribery Compliance Policy and Guidelines, you can contact the Managing Director for information, help or advice.



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APPENDIX I – DUE DILIGENCE QUESTIONNAIRE

QUESTIONNAIRE

Please answer all questions and return the completed Questionnaire as soon as possible to the Managing Director's P.A., together with all of the documents listed at Section E the Questionnaire.

Some questions may not be applicable to particular Service Providers, for example, where the Service Provider is an individual. If this is the case, please state "Not Applicable" at the relevant question and give a short explanation of why the question is not applicable (e.g. "Service Provider is an individual").

Section A: Information about the Service Provider

A1 Full Name and Address of Service Provider

Name:

Company Number:

Address:

City:

Country/Region/State/
Province:

Country:

Postal Code:

Telephone:

Facsimile:

Website Address:

Type of Business:

Contact Person:

Email Address:

A2 Which of the following best describes the Service Provider?

- Individual/ Sole Proprietor Corporation
- Partnership
- Publicly Traded
- Private Corporation Company
- Limited Liability Partnership
- Public Official/ State
- Other (please specify): _____

A3 Type of services to be provided by the Service Provider

- Consultant Agent Distributor Real Estate Broker Agent
 Logistics Provider Contractor Supplier
 Intermediary Freight Forwarder Professional Advisor
 Other (please specify): _____

A4 Date Service Provider was established (mm/dd/yy): _____

A5 Total number of employees of Service Provider: _____

A6 Please list the countries in which the Service Provider operates or provides services:

A7 Please state what relevant experience, resources, qualifications and expertise the Service Provider has which will enable it to carry out the proposed services:

A8 Does the Service Provider have any subsidiaries or a parent company?

- NO YES

If YES, please list these in the table below:

Name of subsidiary/ parent	Registered number of subsidiary/ parent	Country of registration of subsidiary/ parent	% of subsidiary owned by Service Provider

A9 List all **owners, partners or shareholders** of the Service Provider (percentage should total 100%):

If any of the persons listed are not individuals, please provide the ownership information for those persons on a separate page.

Name	Nationality	Ownership %

A10 List all directors (or equivalent) of the Service Provider (including those already listed at question A9 above) and all employees of the Service Provider who will act for or on behalf of Nigerdock:

Name	Job Title	Nationality

A11 Is the Service Provider or any person listed at question A9 or A10 above a person who falls within one of the categories listed below? Do any of the people listed below have an ownership interest, directly or indirectly, in the Service Provider? Do any of the employees of the Service Provider who would be involved in or in any way connected to the contract with Nigerdock fall within one of the categories listed below or are they relatives or a person who falls within one of the categories listed below?

- a current or former government or public official (excluding public officials who could not exert any influence to Nigerdock's benefit, for example, teachers, school assistants, nurses, and librarians)
- a current or former employee of a government or public agency (exclusions as above)
- a public international organisation
- a current or former employee of a public international organisation
- a candidate for political office
- a political party official
- the relative or family member of such person

NO YES

If the answer above is YES, please complete the information below for each person and list the **last** government/political job they or their relative held. If the connection of the Service Provider to a government/political official is through a relative, please state the relative's name and the relationship:

Person's name	Relative's name and relationship (if applicable)	Last government/political job held	Country job was held in	Date job ended



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A12 Will any third parties, intermediaries, or other persons or entities not previously mentioned be involved in transactions or providing services for or on behalf of Nigerdock?

- NO YES

If YES, describe the third party, intermediary, or other persons and what their involvement will be:

A13 Will the Service Provider interact, directly or indirectly, with a government, government agency or public body on behalf of Nigerdock (for example, is the Service Provider owned, in whole or in part, by a government or public body?)

- NO YES

If YES, identify the government, government agency or public body:

Section B: Reference Information

B1 Please provide details of at least 2 significant customers/clients that Nigerdock can contact to obtain a reference (the referees should be commercial business references. References from public officials will not be accepted):

B2 Please provide at least 1 financial reference (e.g. bank/lawyer/accountant) that Nigerdock can obtain a reference from:

Section C: Compliance Information

C1 Is the Service Provider subject to regulatory supervision? If it is, please provide details:

C2 Does the Service Provider currently have a written policy addressing bribery and corruption? If yes, please provide a copy.

- NO YES

C3 Has the Service Provider provided anti-bribery training to its employees? If yes, please provide details:

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C4 Please specify what public liability and employer liability insurance the Service Provider has, including provider and level of cover:

C5 In the past five years has the Service Provider (including any associated or previously associated organisation or any predecessor organisation), or any of the people listed at A9 or A10 above been:

- suspended from doing business in any capacity?
- subject to any allegation of fraud, misrepresentation, bribery, corruption, tax evasion, terrorism or other related activities?
- investigated for or charged with any criminal act (excluding road traffic offences)?
- the subject of a claim; or interviewed, deposed or required to give evidence in connection with any litigation or investigation involving any procurement or competition (anti-trust) laws?

NO YES

If the answer is YES, please provide details:

C6 Has the Service Provider, any individual or entity listed in the questionnaire ever been debarred from World Bank funded contracts?

NO YES

If the answer is YES, please provide details:

C7 Has the Service Provider, any individual or entity listed in the questionnaire ever been debarred from bidding on government or public contracts in any territory in which it has done business?

NO YES

If the answer is YES, please provide details:

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Section D: Method of Payment

D1 If retained by Nigerdock, to which bank in which country does the Service Provider wish payments to be made?

D2 If retained by Nigerdock, in which currency does the Service Provider wish to be paid?

D3 Please indicate the method(s) by which the Service Provider wishes to receive payment(s):

- Cheque Wire transfer

Section E: Documents to be returned to Nigerdock along with completed Questionnaire

Please provide a copy of each of the following when you return this Questionnaire to Nigerdock:

- the Service Provider's latest corporate brochure and annual report
- the Service Provider's written policy addressing bribery and corruption
- financial statements for the Service Provider (audited if available) for the past 3 years.

If you are unable to provide any of the documents listed above, please explain why:

Section F: Certification/ Consent

1 The information provided above is, to the best of my knowledge and belief, accurate, current and complete.

2 I understand that any inaccuracy in the foregoing statements and representations may result in Nigerdock deciding not to do business with the Service Provider, the termination of the Service Provider's relationship with Nigerdock, and loss of any compensation owed by Nigerdock.

3 I agree to notify Nigerdock promptly of any material changes to the information provided in this Questionnaire, both before the Service Provider enters into a contract with Nigerdock and during the term of the contract between Nigerdock and the Service Provider, if applicable.

4 I agree that:

- Nigerdock may contact all business referees provided in this Questionnaire
- Nigerdock may contact all financial referees provided in this Questionnaire

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- Nigerdock may contact companies, individuals or other organisations not listed in this Questionnaire with respect to their current or past experience with the Service Provider
- Nigerdock may store and move the information provided in this Questionnaire electronically
- the decision whether or not to enter into a contract with the Service Provider is solely within Nigerdock's discretion
- Nigerdock bears no liability for alleged damages arising out of delays in the decision process, or from any decision not to enter into a contract with the Service Provider
- I have the authority to bind the Service Provider
- Nigerdock may provide a copy of this Questionnaire to any other company in the Nigerdock Group.

Signed: _____ **Date:** _____

Name: _____ **Position:** _____

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APPENDIX II – RED FLAGS

- Requests by any government/local authority or business decision makers for Nigerdock to use the services of a specific Service Provider.
- Requests for a payment from a person acting on the other side of a transaction (e.g. a selling agent in a property deal)
- Apparent lack of qualifications, resources or experience on the part of the Service Provider to perform the services offered.
- A person employed by a government or public body also works for the Service Provider.
- The Service Provider is or is related to an active or retired public official.
- The Service Provider is owned in whole or in part by a public official or relative of a public official.
- The Service Provider, or a director, shareholder or employee of the Service Provider has a personal, family or business relationship with a public or government official.
- The Service Provider refuses to confirm that it will comply with Nigerdock's Anti-Bribery Policy & Procedures or refuses to accept an anti-corruption compliance clause in its contract with Nigerdock.
- The Service Provider makes reference to political or charitable contributions as a way of influencing the action of public officials, public bodies or others.
- The Service Provider splits fees with anybody without telling Nigerdock first.
- A request by a Service Provider for an unusual or substantial commission or payment.
- Unusual payments made by Service Providers.
- Payment to a Service Provider that is substantially in excess of the going market rate, or not justifiable or appropriate for the work done.
- Requests for payments to be:
 - in cash
 - paid to or through another entity
 - paid to bank accounts in countries other than the country where services are performed
 - paid to offshore bank accounts
 - paid in a currency other than the local currency.
- The Service Provider requests the payment of "admin" or "consultancy" fees or a "commission" to another third party.
- An invoiced amount from a Service Provider that exceeds the agreed amount or reflects undocumented expenses or expenses of an unreasonable amount or kind.
- The Service Provider refuses to give access to its books and records when this is reasonably requested and required by Nigerdock.