



# Business Ethics Policy

Reference Number: WAS-ADF-DI-004

APPROVAL AND REVISION STATUS					
Rev. No.	Issue Date	Revision Identification	Prepared By	Reviewed by	Approved by
03	14-01-2022	3 <sup>rd</sup> Revision	QHSSE Officer	Admin/Finance Manager	Site Manager
			Ekpedeme Utip	Couturier Herve	Denis Lecomte

DENIS LECOMTE  
SITE MANAGER  
WEST ATLANTIC SHIPYARD  
SIGN: \_\_\_\_\_ DATE: \_\_\_\_\_

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**Revision Philosophy**

When amendments are made, the document shall be re-issued with the date and the new revision status reflected in the revision history

After a maximum of 10 revisions, the whole document shall be re-issued.

**Revision History**

Revision No.	Date of issue	Reason for change
03	14-01-2022	Change of admin and finance manager status in page 4
02	28-07-2020	Change in Document Approval on cover page
01	18-09-2019	Human right statement included in section 7.
00	05-01-2019	Initial Issue

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## The Business Ethics Policy

West Atlantic Shipyard is committed to conducting its business in a transparent and ethical manner across all its area of operations and demands the highest standards of integrity in the conducts of its business affairs.

The Company aims to ensure that all of its business activities are conducted fairly and honestly, and that every person connected with the organization has individual responsibility for maintaining an ethical workplace.

Consistent with this philosophy, the Organization strictly adheres to anti-bribery and anti-corruption principles under which the Organization:

- Does not tolerate the solicitation or payment of bribes in any form of for any purpose;
- Will seek to avoid being placed in situations where its judgment (and that of its workforce) might be influenced or appear to be influenced by improper considerations;
- Does not make nor approve facilitation payment (Kickback);
- Requires all dealings with public officials to be conducted in an ethical and transparent manner;
- Requires that receipt or provision of gifts and hospitality is regulated by clear ethical guidelines; and
- Maintains procedure to support the efficient operation and implementation of its business ethics policies.

The organization will not tolerate bribery or corruption in relation to its business; anywhere or in any form and we will comply with the anti-bribery and anti-corruption laws in the country which the organization operates.

**Denis LECOMTE**

Site Manager

West Atlantic Shipyard

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### 1.0 **Applicability of this Policy**

All interested parties relevant to West Atlantic Shipyard scope of services are required to comply with this policy.

The Administrative and Finance Manager is the person who has overall supervision of the application of this policy.

The organization regards failure to comply with this policy as a serious matter constituting gross misconduct or grounds to terminate a business relationship and we will take appropriate measures against any person found to have breached this Policy.

### 2.0 **Anti-bribery and Anti-corruption**

Bribery means offering a financial or other advantages as an inducement or reward for the improper performance by another person of their duties, functions or activities.

West Atlantic Shipyard does not tolerate the offering or acceptance bribes, whether directly or indirectly.

Any payments or gifts made by or on behalf of West Atlantic Shipyard and which induce or are intended to induce someone to act improperly and payments, gifts or inducements to public officials to influence them in the performance of their duty (other than payments, fees etc. which they are entitled to demand by written law), are matters which will be investigated and may result in disciplinary action, including summary dismissal, against employees concerned.

### 3.0 **Gifts and Hospitality**

Hospitality and gifts can lead to or become part of unethical or corrupt practices and therefore all interested parties need to be aware of and to act in accordance with this Policy when offering or accepting gifts or hospitality.

By way of general guidance, gifts and hospitality should reflect a desire to foster good relations and show appreciation, and seek to improve Company's image as a commercial organization.

Gifts and hospitality:

- Should not be lavish or extraordinary;
- Must be recorded and accounted for in a transparent way;
- Should not be used where they could be perceived as seeking to influence business decision-making improperly;
- Should not be offered or accepted as a reward for a transaction or business dealing.

Approval must be sought from top management prior to offering or accepting gifts or hospitality to or from any public official.

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**4.0 Whistle-blowing**

Genuine concerns or suspicious about improper conduct should be reported in the first instance to the Administrative and Finance Manager on the following contact details:

Couturier Herve

Adm & Fin.Manager

+ 234 (0) 805 520 1515

+234 (0) 905 909 0509

h.couturier@was-shipyard.com

All reports will be treated in confidence.


The Organization will not subject anyone who makes a disclosure in good faith to any unfavorable treatment as a result of their disclosure and /or permit retaliation against or victimization of any such person.

**5.0 Facilitation Payments (Kickbacks)**

Facilitation payments (or kickbacks) are payments, often of small amounts, made tom public officials to perform or speed up a routine process. The organization does not permit the making of facilitation payment of any kind. The organization is also committed to ensuring that none of its employees or external providers makes facilitation payments in relation to the Company's business. A normal operating system notification shall be communicated by the General Manager with respect to the executing decisions listed in this document.

**6.0 Conflicts of Interest**

All persons who are required to comply with this policy must strive to avoid any actual or perceived conflict of interest between the interests of the Organization on the one hand, and personal, professional, and business interests on the other hand. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest and may, for example, include a personal relationship with an external provider or business partner. Any activity which could constitute a potential conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is confirmed in writing that the activity does not constitute a conflict of interest and is not detrimental to the reputation and standing of the organization.

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**7.0 Human Rights**

West Atlantic Shipyard human right policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance for a global security group of our scale and diversity. It also sets out the requirement for the conduct of all employees in the organization and those with whom we do business.

In addition, the organization addresses specific human rights issues such as the prevention of modern slavery.

**8.0 Adherence to This Policy**

Since West Atlantic Shipyard aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with the organization principles and policies are not tolerated. Any action by an employee, which deliberately or recklessly breaches this ethics policy, may result in disciplinary action and where appropriate, criminal proceedings will be instituted.