

# ANTI-CORRUPTION POLICY



It is the policy at **National Engineering Services Pakistan (Pvt.) Limited** to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. **NESPAK** does not tolerate, permit or engage in bribery, corruption or improper payments of any kind in its business dealings, anywhere in the world, with either public officials or people in the private sector and is committed to the following principles.

- We will, at all times, carry out our business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to a person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to foreign public officials with the intention of influencing them to our business advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We will not do business with others who do not commit to doing business without bribery.
- We do not allow our directors, officers or 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.
- 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.
- We are committed to a programme to counter the risk of **NESPAK** being involved in bribery.

**NESPAK** is committed to ensuring adherence to the highest legal and ethical standards. This must be reflected in every aspect of the way in which we operate. We must bring integrity to all our dealings. Bribery and corruption harms the societies in which these acts are committed and prevents economic growth and development.

This is not just a cultural commitment on the part of the organization; it is a moral issue and a legal requirement. Bribery is a criminal offence in most countries in which **NESPAK** operates, and corrupt acts expose the Company and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation.

This policy has been adopted by the **NESPAK** main board and is to be communicated to everyone involved in our business to ensure their commitment to it. The board attaches the utmost importance to this policy and will apply and enforce a strict "zero tolerance" approach to acts of bribery and corruption by any of our employees or by business partners working on our behalf. Any breach of this policy will be regarded as a serious matter by the Company and will result in disciplinary action for employees, including where appropriate summary dismissal, or cessation of business in the case of business partners.