




Policy

Anti-Corruption Policy

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About this document


Purpose	The Anti-Corruption Policy is implemented to prevent corruption in all of Aker BP's business activities and is meant to be a resource for all Aker BP Representatives to act in accordance with our values. The purpose of the Anti-Corruption Policy is to secure that all business operations of Aker BP are conducted in an ethical manner and in compliance with Applicable Rules
Valid for	This policy applies to all organisational units and geographical locations.
Revision Period	2 Years
Non-conformity/ Deviations	If unable to comply with requirements stated in this document, process for deviations and non-conformity applies.

Role	Name
Owner	Board of Directors
Verifier	Karl Johnny Hersvik
Coordinator	Anja Haugland Fischer

Rev.no.	Date	Description of Change
2.0	2021-02-09	<ul style="list-style-type: none"> • Split reorganized and moved text. Minor language edits throughout the policy • Added employee and manager responsibilities in chapter 1.4 • Updated text and added new rules and procedural requirements in chapter 3 (Gifts and hospitality), 4 (Charitable donations and sponsorships) and 5 (Relationship with third parties) • Added new chapter 5.3 (Public Officials) • Removed chapter 4.2.1 as the content is covered in chapter 3 (Gifts and hospitality) • Format changes throughout policy (removed colour boxes)
1.0	2018-04-16	First issue for Aker BP

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1 The Anti-Corruption Policy

1.1 Purpose

Aker BP opposes corruption in all forms – direct as well as indirect, active as well as passive, and in both private and public sector. We are committed to conduct our business with integrity and in accordance with the high ethical standards reflected in our Code of Conduct and this policy (the “**Anti-Corruption Policy**”), applicable laws, rules and regulations, as well as internationally accepted guidelines, conventions or similar relating to corruption, money laundering, fraud, slavery, environment, human rights, or similar activities (“**Applicable Rules**”).

Corruption often occurs in connection with other, related types of criminality, such as money laundering, which is also covered in this Anti-Corruption Policy. Others, such as inside trading and anti-competitive behaviour, are covered by separate Aker BP policies.

The Anti-Corruption Policy is implemented to prevent corruption in all of Aker BP’s business activities and is meant to be a resource for all Aker BP Representatives to act in accordance with our values. The purpose of the Anti-Corruption Policy is to secure that all business operations of Aker BP are conducted in an ethical manner and in compliance with Applicable Rules.

1.2 Scope


The Anti-Corruption Policy applies to all who are acting on behalf of Aker BP, including directors, officers, employees, hired-in personnel, consultants, agents, and other intermediaries (the “**Aker BP Representatives**”).

Aker BP has business relationships in many forms and areas. We refer to the entities, organizations, and individuals with whom we do business as “Business Partners”. This includes partners in operated licenses, joint venture partners, entities and individuals who act on behalf of Aker BP, such as agents, distributors and other intermediaries, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship. Our commitment to conducting our business with integrity applies similarly to all our business relationships with all our Business Partners. This involves that we always must follow the process for integrity due diligence and monitoring of potential and existing Business Partners set out in this policy and in Aker BP’s Business Partner Integrity Procedure (D2 number 72-001079). We expect all Business Partners to adhere to anti-corruption rules or policies with similar content as this Anti-Corruption Policy, as well as Applicable Rules.

1.3 Applicable Rules

Aker BP is subject to the corruption provisions in the Norwegian Criminal Act (Nw. “straffeloven”). Aker BP is also subject to the legislation in other countries where we do business, which may include the UK Bribery Act and the US Foreign Corrupt Practices Act. Although this Anti-Corruption Policy is intended to comply with all relevant laws, rules and regulations, there is no guarantee that complying with this Anti-Corruption Policy automatically ensures compliance with all Applicable Rules. It is the responsibility of all Aker BP Representatives to be sufficiently acquainted with the Applicable Rules. All Aker BP Representatives who conduct activities in jurisdictions where other laws, rules and regulations are relevant should thus seek advice as needed from Aker BP’s Compliance or Legal departments.

The Norwegian anti-corruption legislation is amongst the strictest in the world. According to the Norwegian Criminal Act, all forms of corruption, including bribery, facilitation payments and trading in influence, are prohibited. The Norwegian Criminal Act also prohibits corruption performed indirectly through agents, consultants, or other intermediaries. The corruption provisions in the Norwegian Criminal Act apply to all Norwegian citizens and companies, as well as foreign companies and individuals residing in Norway, for corruption committed in Norway and abroad, regardless of whether

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the action is a criminal offence in the other country or not. The Norwegian Criminal Act covers both personal liability and company liability.

The corruption provisions do not only cover responsibility with respect to own organization but also complicity with respect to Business Partners (partners in operated licenses, joint venture partners, entities and individuals who act on behalf of Aker BP, such as agents, distributors and other intermediaries, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship). It is important to note that Applicable Rules and the enforcement of these are evolving with time. There has been a substantial legal transition during the past 15 years. Custom practice and accepted behaviour from a few years ago, might be prohibited today.

1.4 Content and responsibility

The Anti-Corruption Policy summarizes the Applicable Rules, policies, and procedures to which all of the Aker BP Representatives must adhere and identifies resources that are available within Aker BP to assist you in complying with this Anti-Corruption Policy. The approver of this policy is the Board of Directors of Aker BP. The owner of the policy is the CEO. The Compliance Officer is the functional owner, and is responsible for the maintenance, communication, and monitoring of this Anti-Corruption Policy, including implementing changes in Applicable Rules. The CEO of Aker BP is ultimately responsible for the implementation of the Anti-Corruption Policy and for the monitoring of its operational effectiveness. Aker BP's CEO must approve all deviations from this Anti-Corruption Policy

1.4.1 *Aker BP Representatives' Responsibility*

All Aker BP Representatives agree to uphold Aker BP's commitment to conducting our business with integrity, by following this Anti-Corruption Policy as well as Applicable Rules. A failure to follow this Anti-Corruption Policy or Applicable Rules will be considered misconduct, which could result in disciplinary actions being taken – including termination of employment – and the case may be reported to the authorities. Violations can also lead to civil and criminal penalties, including imprisonment, for the persons involved.

As an Aker BP representative you are expected to:


- Familiarize yourself with this policy and the Code of Conduct
- Never engage in or authorize any corrupt activity
- Exercise due care in decision making and never compromise ethics when doing business
- Report anything that is likely to constitute a breach of this policy or the Code of Conduct to your line manager, the Compliance or Legal departments, a member of the executive management or on the Integrity channel
- Participate in relevant business ethics and compliance training
- Contact Aker BP's Compliance or Legal departments if you have any questions or concerns

1.4.2 *Additional Responsibility for Executive Vice Presidents and Line Managers*

Aker BP managers are expected to actively lead, promote, and implement this Anti-Corruption Policy and be role models. Each operational unit and business area have independent responsibility for adherence to, and the implementation of, Aker BP's internal anti-corruption compliance programme, accompanying policies and procedures, and compliance with Applicable Rules at any given time.

As an Executive Vice President or Line Manager, you are expected to:

- Familiarize yourself with this policy, the Code of Conduct, and Aker BP's compliance program
- Promote and implement requirements, measures and controls as defined in Aker BP's anti-corruption compliance program in your line of business

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- Proactively manage integrity risks in your line of business
- Lead by example
- Create an atmosphere where Aker BP Representatives can share their dilemmas and where they can raise their voice and report anything that is likely to constitute a breach
- Ensure that your team members are aware of and follow Aker BP's values, policies, and procedures
- Ensure that your team members participate in mandatory business ethics and compliance training

2 Corruption

2.1 Definition

Corruption is the abuse of entrusted power for private or corporate gain. It is a threat to business and society, and undermines legal business activities, distorts competition, ruins reputations, and exposes companies as well as private individuals to civil and criminal penalties. **No Aker BP Representative shall engage in, authorize or otherwise complicit to corrupt activities.**

In this Anti-Corruption Policy, corruption is defined in the same way as in the Norwegian Criminal Act (Nw. "*straffeloven*") Section 387: When a person (legal or physical) promises, offers or gives ("active corruption"), or requests, receives or accepts ("passive corruption") an improper advantage in connection with the execution of a position, office or an assignment.

It is important to remember that corruption occurs everywhere, including in Norway, and that each of us has a responsibility to proactively combat corrupt actions.

Corruption includes bribery, facilitation payments and trading in influence. Bribery typically involves offering, giving, accepting, or receiving anything of value as an inducement for the other party to do something that is dishonest, illegal or a breach of trust.

Prohibited corruption encompass corrupt acts performed both directly and indirectly through third parties, such as agents and consultants. Corruption may further involve both public officials and persons, any person acting on behalf of customers or subcontractors/suppliers, as well as any other third parties. Corrupt activities may encompass improper advantages to the persons involved in the corruption scheme, but also improper advantages to the benefit of the involved persons' partners/spouses, relatives, and friends.


2.2 Advantages – Forms of Corruption

Advantages may include anything of material or immaterial value.

Advantages can be obtained either directly or indirectly, through intermediaries, family members or friends, to or from any person, including national, international, and foreign public officials, private sector employees etc. An advantage can also be disguised, inter alia in an overpayment for a rendered service etc.

Anything of value covers just about any form of benefit, including, but not limited to:

- Cash or cash equivalents, loans, gifts, or prizes
- Employment offers or promises of future employment (to the individual or any of his/hers close relatives)
- Favourable terms on a product or service, or product discounts
- Entertainment/hospitality (payment of travel, hotel, or restaurant bills, living expenses, or costs of trips or resort stays)
- Use of vehicles or vacation homes
- Discounted or free tickets to events

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- Services, personal favours, or home improvements
- Political or charitable donations
- Securities or shares, including the opportunity to buy shares
- Transfers of value through commercial agreements or clauses, such as concession, production sharing or gas sales agreements or contracts or rebates
- Social investments, sponsorships, donations, or scholarships
- Payment of medical treatment (for the individual or any of his/hers close relatives)
- Payments to the close relatives of a public official for consultancy services
- Sexual favours
- Promises of further business relations

2.3 Improper advantages

Normally, the purpose behind the improper advantage would be to influence someone for an improper purpose, including to obtain or retain business or any business advantage. If the intention behind the advantage is to influence the other person, even a small gift could be considered “improper”. However, the intention to influence is not a condition for an advantage to be assessed as “improper”. If you are in doubt about whether an advantage can be considered “improper”, you should discuss with your line manager, the Compliance or Legal departments.

Is the advantage “improper”?


- Consider the situation as a whole
- What is the size of the advantage?
- What is your relationship to the other party?
- What is the frequency?
- Is the advantage in conformity with internal guidelines?
- Is the advantage given in a transparent manner? Have you disclosed it to your line manager? Can you talk about it openly with your colleagues?

2.4 Facilitation payments

A facilitation payment is a small amount paid to a public official to secure or expedite the performance of a routine government action that the official is obliged to perform without receiving such payment, and to which the payer has legal or other entitlement. The payment is usually a cash payment but could also involve other benefits or favours. Making a prohibited facilitation payment can expose both Aker BP and the individual making or authorising the payment at risk of criminal prosecution. Aker BP does not permit prohibited facilitation payments being paid no matter how small they may be except for in the circumstances explained below. Prohibited facilitation payments should not be confused with payments that Aker BP are required to make under local laws or written regulations in order to obtain various types of government services.

Facilitation payments typically involve paying for:

- Processing of papers
- Issuing of official approvals, permits and licenses, such as building permits, work permits and visas
- Obtaining customs clearance
- Securing public utility services, such as mail services and power and water supply
- Returning a passport at a border control, or otherwise securing permissions to leave or enter a country
- Unloading shipments within reasonable time (sometimes avoiding costly delays)

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How does this apply to you?

- Inform Business Partners that Aker BP does not make facilitation payments
- Identify and report the risk of facilitation payments. Inquiries from potential or existing Business Partners regarding facilitation payments are red flags, and should be reported
- Never make a facilitation payment, unless you genuinely believe that your or another's life, health or safety could be in danger, and you have no other alternative but to make the payment. In such cases, you may pay the smallest amount possible to remove the risk, but first obtain prior approval from your line manager or the Lead Compliance Officer, or – if that is impossible – report the payment to these individuals immediately after the payment has been made. Any facilitation payments shall be recorded in Aker BP's systems
- If possible, ask for a receipt for the payment, and record it in Aker BP's systems

3 Gifts and hospitality

3.1 Gifts

Aker BP does not allow gifts or hospitality where giving or accepting them could influence business decisions, violate any local laws or the policies of the recipient company, or cause others to perceive such influence or violation. A gift can be anything of value, and the value does not need to be high. Irrespective of the value, gifts may have the appearance of an improper advantage, and thus corruption.

As an Aker BP Representative, you can only offer, give, accept, or receive gifts that are promotional items of minimal value. This means that Aker BP Representatives shall refrain from inter alia exchanging customary gifts at festivities (such as Christmas presents) and accepting gifts as a token of appreciation (such as gifts received after the completion of a transaction etc.). However, Aker BP Representatives may accept modest gifts given as a token of appreciation in connection with the individual's personal efforts at events or similar, such as flowers received after the individual has spoken at a conference. **Gifts given or received in connection with contractual negotiations, tenders, transactions etc. are always prohibited.** Aker BP Representatives must never request or solicit gifts from business relations or third parties seeking to do business with Aker BP.


Aker BP has implemented this no gifts policy to minimize any ambiguity, and to implement rules which are easily practicable for all Aker BP Representatives. Exceptions may be permitted in special circumstances, subject to written approval from the CEO.

A gift may be anything of value, such as:

- Fruit baskets or chocolate boxes
- Wine
- Discounts, vouchers, gift cards
- Various memberships, such as membership to a golf club or VIP status
- Tickets to an event
- Cash

Promotional items of minimal value may include:

- A bag, cap, t-shirt, umbrella
- Calendars, notebooks, pens
- USB sticks, power banks
- Drinking bottles, mugs
- Normally, such items are branded with a company logo which cannot be easily removed

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If you receive a gift which is not in compliance with the above, you should decline or return it. If this is not possible due to practical, cultural or courtesy reasons, i.a. because such decline or return would be highly insulting, you must notify the Compliance department, who will consider whether the gift should be turned over to Aker BP, as soon as possible.

All gifts, except promotional items of minimal value, must be registered in the Aker BP Gifts and Hospitality Register, which can be found on Aker BP's internal website. This includes gifts that have been offered to you but which you have declined or returned, and gifts which you have not been able to decline or return and which have been turned over to Aker BP. It also includes gifts given as a token of appreciation in connection with the individual's personal efforts at events etc. Your registration will help us evaluate our existing and potential Business Partners, detect potential corruption risks, and better be able to assess with whom we should or should not do business.

How does this apply to you?


- Inform your business relations and other third parties with whom you are working of Aker BP's no gifts policy
- Never offer, give, accept, or receive gifts, except for promotional items of minimal value
- Never accept or offer a gift that would influence your or any other person's judgment, or cause others to perceive such influence
- Never offer, give, accept, or receive cash or cash equivalents
- Never offer, give, accept, or receive any gifts in connection with contractual negotiations, tenders, transactions etc.
- Never solicit or request gifts from Business Partners or third parties seeking to do business with Aker BP
- If you receive a gift which is not in compliance with the above, you should decline or return it
- If it is not possible to decline or return the gift, you must contact the Compliance department and turn it over to Aker BP as soon as possible
- All gifts, except promotional items of minimal value, must be registered in the Gifts and Hospitality Register
- If you have questions or concerns, contact the Compliance department

3.2 Hospitality

Hospitality may take various forms, such as seminars, entertainment, sporting events, concerts, meals, trips, and other forms of representation. For the avoidance of doubt, simple meals served at the office premises of our Business Partners or other third parties, are not to be considered as hospitality. Hosting and attending hospitality can be a legitimate part of our business and can foster good business relationships. However, hospitality may also be considered an improper advantage, and thus corruption.

Aker BP Representatives shall only accept or offer hospitality which has a clear business purpose, and provided that the cost of such hospitality is reasonable. The hospitality must be customary and commonly accepted, not excessive in value and given without any understanding that the recipient is in any way obligated by the acceptance of the hospitality. Seminars which have academic or business relevant programs, and where the costs for inter alia food, beverage and entertainment are within reasonable limits, are normally allowed.

You must exercise caution and good judgement in relation to the reasonableness and proportionality of offering or accepting hospitality. Be particularly careful before offering or accepting hospitality in connection with contractual negotiations, tenders, transactions etc., and make sure such hospitality is ethically justifiable and cannot be perceived to possibly influence business decisions. Always notify your immediate superior or line manager before offering or accepting hospitality. Consult with the Compliance department if you have any doubts regarding whether the hospitality is acceptable. If the

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hospitality is not clearly acceptable, you must obtain written approval from your line manager or the Compliance department before offering or accepting the hospitality.

Aker BP Representatives must never request or solicit hospitality from business relations or third parties seeking to do business with Aker BP.

Aker BP Representatives must never accept that a Business Partner or any other third party pays for travel, accommodation, or other related expenses (such as taxi expenses, laundry bills and expenses for meals other than the joint meals). All such expenses shall be paid by Aker BP. If Aker BP is hosting a business-related event, all Business Partners and third parties must cover such expenses themselves.

How do I assess whether the hospitality has a clear business purpose and the costs are reasonable?


- What is the purpose of the hospitality?
- What is the form and content of the hospitality? Is there a clear academic or business relevant program?
- In what situation is the hospitality arranged?
- What is the value and nature of the hospitality?
- Is the hospitality transparent?
- What is the frequency of the hospitality? As a rule of thumb, no Aker BP Representative shall accept or offer hospitality from the same party more than two or three times per year

Be particularly aware in the following situations:

- Events which includes partners/spouses and/or public officials
- The program does not have a clear business or academic agenda
- The hospitality is hosted in connection with contractual negotiations, tenders, transactions etc.
- The hospitality is subject to personal taxation
- The hospitality is offered for something in return

How does this apply to you?

- Before accepting or offering hospitality, make sure it has a clear business purpose and that costs are reasonable
- Be particularly careful before offering or accepting hospitality in connection with contractual negotiations, tenders, transactions etc. and make sure such hospitality cannot be perceived to possibly influence business decisions
- Never accept that costs for travel, accommodation, or other related expenses (such as taxi expenses, laundry bills and expenses for meals other than joint meals) are paid by a Business Partner or any other third party. Aker BP shall not cover any such expenses for business relations or third parties
- Obtain written approval from your line manager or the Compliance department unless the hospitality is clearly acceptable
- All hospitality shall happen in an open and transparent manner, and be given without any understanding that the recipient is in any way obligated by the acceptance of the hospitality
- Never solicit or request hospitality from Business Partners or third parties seeking to do business with Aker BP
- Ensure that all hospitality is registered in the Gifts and Hospitality Register. This also includes hospitality that you have been offered, but which you have declined or returned
- If you have questions or concerns, contact the Compliance department

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4 Charitable donations and sponsorships

Charitable donations are payments made, in cash or in kind, for the benefit of a community or other humanitarian causes. Typical areas for such donations are education, health, sports, culture, support to non-governmental organizations and other social welfare causes. Payments are made without demands or expectations of anything in return, but may result in goodwill for Aker BP.

A **sponsorship** is a transaction where a sponsor makes a payment, in cash or in kind, to associate its name with an activity or an organization, and receives specific rights and benefits in return, such as the promotion of the sponsor's name, products and services. There must be documented tangible benefits for Aker BP associated with any sponsorship, such as commercial gain, professional development, enhanced profiling etc. The criteria for Aker BP's sponsorships are that the sponsorship shall be strategic and reflect Aker BP's values, quality, and profile.

VP Communication is responsible for the sponsorship budget and will approve and sign all sponsorship agreements and charitable donations. There shall be no personal interests involved in the decision to sponsor an organisation. In situations where a conflict of interest exists, the conflicted individual shall withdraw from any associated decision-making process. All sponsorships must be governed by a written and approved contract, which has been reviewed by Supply Chain Management, and clearly defines Aker BP's contribution, the other participating organization's contribution and the project's goal, beneficiaries, milestones, timelines, and costs. Tax impact shall be evaluated for each agreement. Full documentation of the donation or sponsorship must be made available and kept after implementation. The company shall perform integrity due diligence of the receiving party to ensure that the receiving party does not represent a risk related to reputation, human rights, corruption, conflict of interest, environment or similar.

Charitable donations and sponsoring shall never be made if the purpose is to improperly influence anyone. Neither shall such payments be made if the recipient has close ties to public officials who have authority to make decisions in matters of importance to Aker BP or existing or potential business relations. No such payments shall be made to individuals or be used for private purposes. All charitable donations and sponsoring shall be made in accordance with Aker BP's Code of Conduct, this Anti-Corruption Policy, the Sponsorship Policy, and Applicable Rules.

How does this apply to you?


- All charitable donations and sponsoring shall be approved by the VP Communication prior to being implemented
- All charitable donations and sponsoring shall be made in accordance with Aker BP's Code of Conduct, this Anti-Corruption Policy, Sponsorship Strategy, and Applicable Rules

4.1 Religious and political contributions

Political contributions are any contributions, made in cash or in kind, to support a political cause or party. Contributions in kind may include advertisement for or promotion of a political party, buying tickets for political fund-raising events and contributions to research institutions with close connections to a political party.

Neither Aker BP nor any of the Aker BP Representatives shall make financial contributions to religious organisations, political parties or in support of political causes on behalf of Aker BP. This does not preclude Aker BP from supporting political views in the interest of the company.

Aker BP Representatives may choose to participate in political or religious activities in their own personal capacity, as long as they do not use any resources that are the property of Aker BP for these activities.

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How does this apply to you?

- Neither Aker BP nor any Aker BP representative shall make financial contributions to religious organizations, political parties or in support of political causes on behalf of Aker BP. This does not preclude Aker BP from supporting political views in the interest of the company
- Never use resources that are the property of Aker BP in connection with your personal participation of political or religious activities

5 Relationships with third parties

5.1 Aker BP Representatives, including agents

This Anti-Corruption Policy applies to all individuals and entities who falls under the Aker BP Representative definition. This also includes lobbyists, business agents and sales representatives who act as links between Aker BP and third parties.

In Aker BP we try to avoid the use of typical agents and intermediaries entirely. If agents or other intermediaries are used, an integrity due diligence investigation, as further described in Aker BP's Business Partner Integrity Procedure (D2 number 72-001079), shall be carried out. The CEO shall approve all hiring of agents and intermediaries prior to any commitments being given and any work being initiated.


If agents or other intermediaries are used, all agreements regarding the relationship between the agent/intermediary and Aker BP shall be in writing and sufficiently describe the relationship between the parties. The agreed compensation for an agent or other intermediary must be proportional to the service rendered, and any payments made shall be in accordance with the agreed compensation and subject to satisfactory documentation of the rendered services. The work of the agent or intermediary shall be closely monitored. The agreement regarding the engagement shall oblige the agent/intermediary to act in accordance with Aker BP's Code of Conduct, this Anti-Corruption Policy and Applicable Rules. No illegal payments shall be channelled through agents or intermediaries.

How does this apply to you?

- Never engage agents or intermediaries without first obtaining the approval from the CEO
- Follow Aker BP's Business Partner Integrity Procedure (D2 number 72-001079) whenever agents and intermediaries are used
- All agreements with agents/intermediaries shall be in writing, sufficiently describe the relationship between the parties and oblige the agent/intermediary to act in accordance with Aker BP's Code of Conduct, this Anti-Corruption Policy and Applicable Rules
- The agreed compensation shall be proportionate to the services rendered and any payments shall be in accordance with the agreed compensation and subject to satisfactory documentation
- All agreements should oblige agents/intermediaries to go through mandatory business ethics and compliance training
- No illegal payments shall be channelled through agents or intermediaries

5.2 Business Partners

Aker BP's Business Partners includes partners in operated licenses, joint venture partners, entities and individuals who act on behalf of Aker BP, such as agents, distributors and other intermediaries, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship. Aker BP may be held accountable for corrupt activities executed by all of our Business Partners.

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Aker BP expects all Business Partners to adhere to ethical standards consistent with ours. Before entering into new business relationships, including entering into joint ventures or similar business arrangements, or before concluding a merger or acquisition process, appropriate and risk-based integrity due diligence investigations shall be conducted. The internal owner of the proposed business relationship, merger or acquisition must inform the Compliance department of the upcoming potential prospect. The Compliance Department will support with determining the appropriate level of the integrity due diligence and assessing the potential integrity risks associated with the proposed business relationship. The different levels of integrity due diligence are described in the Business Partner Integrity Procedure (D2 number 72-001079).

There are certain **red flags** to be particularly cautious about when considering whether to enter into a business relationship. A red flag is an indication of a potential problem or misconduct, which means that you have to stop, think and do necessary investigations to clarify whether you have identified an actual problem which could put the business at risk.

Examples of red flags


- Third parties who refuse to adhere to the principles set out in the Aker BP Code of Conduct or this Anti-Corruption Policy, or who do not have ethical guidelines
- Third parties who refuse to provide complete information or required disclosures
- Third parties with needlessly complicated corporate structures, or who make use of shell or holding companies or blind trusts
- Third parties who require that payments are made to another third party or in a country which has no connection to the transaction or operations, including tax havens
- Credible reports of fraudulent behaviour
- Third parties facing financial difficulties
- Requests for unusually large commissions, success fees, or irregular payment structures
- Requests for reimbursement of poorly documented or questionable expenses

All establishment of joint ventures requires the prior approval of the CEO, and no work shall commence, and no commitment may be given until approval has been given by the CEO and the contract has been signed.

All agreements with Business Partners shall to the extent possible include Aker BP's template clause for compliance with Aker BP's Code of Conduct and this Anti-Corruption Policy, or similar commitments to adhere to ethical standards consistent with those of Aker BP. If existing contracts do not include such provisions, reasonable steps shall be taken to amend the relevant contracts to include such commitments in connection with renewal of the contracts.

How does this apply to you?

- Involve the Compliance department as early as possible if you consider entering into joint ventures or similar business arrangements, or before concluding a merger or acquisition process
- Follow the rules set out in the Business Partner Integrity Procedure (D2 number 72-001079)
- Ensure that appropriate integrity due diligence of potential Business Partners or business relationships is completed prior to entering into business relationships
- Business relationships shall be continuously monitored and reassessed
- To the extent possible, all business relations shall adhere to Aker BP's ethical standards by including Aker BP's template clause for compliance with Aker BP's Code of Conduct and this Anti-Corruption Policy
- If you have any questions to the above, contact the Compliance or Legal departments

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5.3 Public Officials

In our business operations, we may interact with public officials. Dealings with public officials require extra caution in the way we conduct ourselves. Gifts, hospitality or any financial or other advantage shall not be offered, promised, given to, or received from public officials unless this is subject to written pre-approval from Aker BP's Lead Compliance Officer or General Counsel.

Who are considered public officials?

- An elected or appointed official, officer, or employee of national, provincial, regional, or local government agency or department
- An employee of a government-owned or controlled entity
- An employee or member of a political party
- An employee of public international organizations or non-governmental organizations (NGOs)
- Any person acting in an official capacity for or on behalf of a public official

How does this apply to you?

- Never, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise, or give any improper advantage to a public official to make the official act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary
- When engaging with public officials, do so in a transparent and straightforward manner, and always exercise the utmost integrity

6 Criminal offences related to corruption


6.1 Anti-Money laundering

Money laundering is the process when a person or party hides illegally acquired funds – money or all other forms of assets – or tries to make such funds look legitimate. Money laundering also includes the use of legitimate funds to support criminal activity or terrorism.

Aker BP is firmly opposed to all forms of money laundering. In order to avoid being involved in money laundering, all employees shall ensure that Aker BP's Business Partner Integrity Procedure (D2 number 72-001079) is followed and that all concerns are reported in accordance with the Procedure for handling Integrity Reports (D2 number 73-000865) (see chapter 7.2). You should seek advice from the Compliance or Legal departments if you need a better understanding of money laundering and how to mitigate such risk to Aker BP.

How does this apply to you?

- Make sure you know who you are doing business with by performing integrity due diligence on Business Partners in accordance with the Business Partner Integrity Procedure (D2 number 72-001079)
- Be attentive to attempts to make payments in cash or otherwise unusual banking arrangements
- Report suspicious transactions or incidents of money laundering to the Legal or Compliance departments
- Raise concerns where you see them

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7 Operating principles

7.1 Where to seek guidance

It is important that all Aker BP Representative seek guidance in case of uncertainty in respect of compliance with this Anti-Corruption Policy or other Aker BP policies, processes, and procedures.

Where this Anti-Corruption Policy does not answer your questions, guidance may be sought from line managers, the Compliance or Legal departments, or others from the executive management. When possible, Aker BP Representatives are always encouraged to raise questions to their line managers, the Compliance or Legal departments, or representatives from the executive management.

7.2 Report concerns on the integrity channel

Aker BP Representatives are required to report immediately any suspected violation of Aker BP's Code of Conduct, this Anti-Corruption Policy or Applicable Rules. Such reporting should be done to your line manager, other management, or a relevant function such as Compliance, Legal, HR, HSSEQ or a representative from the executive management.

If you are unable to speak to your line manager, a support function, or the executive management, you may report concerns of non-compliance directly through Aker BP's Integrity Channel. The Integrity Channel is available at www.akerbp.com, and you may choose to be anonymous.

The management is obliged to ensure that such cases are handled in accordance with the Procedure for handling Integrity Reports (D2 number 73-000865). Aker BP will not impose any form of retaliation against anyone for making a good-faith report. All reports of suspected violations will be taken seriously and will be followed up, as appropriate.

7.3 Possible violation – realised in hindsight

In case an Aker BP Representative realises in hindsight that a situation that she/he has been involved in may have been a breach of Applicable Rules, the Code of Conduct, this Anti-Corruption Policy or international recognised standards for ethical behaviour, the Aker BP Representative shall report the situation to her/his line manager. The line manager shall further report to the Lead Compliance Officer. The Aker BP Representative may also report the situation directly to the Lead Compliance Officer.

7.4 Disciplinary actions and criminal sanctions

Aker BP will not accept any violation of Applicable Rules or of this Anti-Corruption Policy, and we take appropriate actions to mitigate such violation. Properly founded allegations or evidence of violations of this Anti-Corruption Policy will result in investigations which will result in disciplinary actions if allegations are proved. Disciplinary actions will range from verbal warnings (from line managers or HR) to dismissal. Aker BP will also support criminal investigations and prosecutions when relevant.

Any violations of Applicable Rules may expose both companies and individuals to civil and criminal penalties, such as fines and/or imprisonment. Managers and business owners may in addition be deprived of the right to exercise the profession or pursue business activities.