






الشركة العمانية لدرفلة الالمنيوم
OMAN ALUMINIUM ROLLING COMPANY

ANTI CORRUPTION & ANTI BRIBERY PROCEDURE OARC -CORP-PRO- D001

Rev	Date	Description	Prepared by	Reviewed By	Approved by
00	26.2.2024	Initial Issue	HR Specialist	Manager - HR	CEO
		Signature			

Rev.	Issue Date	Page
0	0	1 of 6

1. Objective:

OARC is committed to setting up the highest standards for transparency and accountability in all its affairs. OARC strives in attaining its mission through compliance of high legal and ethical standards. OARC does not tolerate any form of bribery, embezzlements, or corruption, and will uphold all laws countering bribery, fraud, and corruption in all forms.


2. Purpose:

The purpose of this procedure is to set out the responsibilities of OARC and those individuals acting on its behalf in observing and upholding OARC's position on bribery and corruption. Every individual or group of individuals, associated to OARC in any form. The basic objective of this statement is setting out the procedure of OARC towards the prevention and identification of bribery and corruption and the certain procedures to be followed, if at all, any fraud is found or having an idea / impression of its existence.

3. Scope:

This procedure applies to the Staffs, Contractors, Advisers, Consultants, Suppliers, Partners, and Individuals acting on behalf of OARC, irrespective of their location. CEO has been excluded from the scope. The CEO has vested powers and responsibilities to various functionaries and constituted committees to execute routine functions of the organization.


4. Statement:

 أوارك OARC الشركة العمانية لدرفلة الألمنيوم OMAN ALUMINIUM ROLLING COMPANY	ANTI CORRUPTION & ANTI BRIBERY PROCEDURE	Rev.	Issue Date	Page
	OARC -CORP-PRO- D001	0	0	2 of 6

- i. OARC will not engage in bribery or any form of unethical inducement or payment including facilitation payments and "kickbacks." All the Staff, Contractors, Advisers, Consultants, Suppliers, Partners and Individuals acting on behalf of the OARC are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activities of OARC.
- ii. OARC expects its suppliers and partners to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.

5. Prohibited Activities:


- i. It is prohibited, directly or indirectly, for any staff or individual acting on behalf of OARC to offer, give, request or accept any bribe (i.e. gifts with mala-fide intentions, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for OARC, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
- ii. This procedure requires employees and individuals acting on behalf of OARC:
 - a. Not to offer, promise or make any bribe or unauthorized payment or inducement of any kind to anyone;
 - b. Not to solicit business by offering, promising or making any bribe or unofficial payment to suppliers;

 أوارك OARC الشركة العمانية لدرفلة الألمنيوم OMAN ALUMINIUM ROLLING COMPANY	ANTI CORRUPTION & ANTI BRIBERY PROCEDURE	Rev.	Issue Date	Page
	OARC -CORP-PRO- D001	0	0	3 of 6

- c. Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorized by OARC in the ordinary course of business;
- d. To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers;
- e. Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. OARC will not tolerate or condone such payments being made;
- f. To report any breaches of this procedure principles or standards or of any associated

6. Criminal Offence (as defined by Royal Decree No. 64/2013)

- i. It is a criminal offence to:
 - a. Offer a bribe;
 - b. Accept a bribe;
 - c. Fail to prevent a bribe (only applies to commercial organizations)
- ii. Staffs, ad-hoc staff, advisers, consultants, suppliers, partners and any individuals acting on behalf of OARC should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence an individual could face prosecution as per the norms of Oman Penal Code.

 أوارك OARC الشركة العمانية لدرفلة الألمنيوم OMAN ALUMINIUM ROLLING COMPANY	ANTI CORRUPTION & ANTI BRIBERY PROCEDURE	Rev.	Issue Date	Page
	OARC -CORP-PRO- D001	0	0	4 of 6

7. Gifts and Hospitality:

OARC realizes that giving and receiving of gifts and hospitality without any mala-fide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this procedure.

8. Raising a Concern

- i. If an employee or an individual acting on behalf of OARC is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Should this be the case, the employee or individual should at first instance contact the Ethics & Whistleblower Committee as soon as they are able to do so. The employee or individual may be required to give a written account of the events to assist with any investigation. If any member of the Ethics & Whistleblower Committee is involved in such an act, the individual may contact the CEO to report the case.
- ii. Employees or individuals acting on behalf of OARC are encouraged to raise concerns about any instance of bribery or corruption at the earliest possible stage. The employee or individual raising a concern can do so in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.

Rev.	Issue Date	Page
0	0	5 of 6

iii. If any instance of bribery or corruption is identified; OARC management will take the remedial steps immediately. OARC has its own system of investigating its staff members for violation of service conduct including financial irregularities, corruption, fraud or embezzlement. If the charges are proved the delinquent may be awarded penalties depending on the gravity of misconduct.

iv. These rules are based on the following principles: -

- a. The right of OARC to take appropriate disciplinary steps against any delinquent staff member, who acts in a manner conflicting with the code of conduct and prescribed rules / regulations.
- b. At the same time the rules also recognize the right of delinquent staff member to a fair hearing and applicable and just disciplinary action.
- c. The emphasis of disciplinary action is on prevention, justice and rehabilitation.

9. **Review:** In the interest of maintaining best practice, the contents of this procedure will be reviewed by the Head of Human Resources as and when required.

10. Reporting and Investigation:

- o Ethics & Whistleblower Committee & Head- HR at primary level.
 - o CEO at secondary level
- ii. Investigation will be done by the Ethics & Whistleblower Committee

Rev.	Issue Date	Page
0	0	6 of 6

Revision:

Revision No	Date	Pages	Revision Details
0	26.2.2024	6	Original

Circulation / Distribution

Department / Function

Records

Identification	Location	Retention Period	Responsible

Related Document

Document Title	Document No.