



# LANFORCE ENERGY ANTI CORRUPTION AND BRIBERY POLICY

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## Purpose

Lanforce (together with its subsidiaries, Stakeholders and Partners) is committed to conducting business in accordance with all applicable laws, rules and regulations and to the highest ethical standards, and this commitment is embodied in our Code of Ethics.

The purpose of this Anti-Bribery and Corruption Policy is to reiterate Lanforce (together with its subsidiaries, Stakeholders and Partners) commitment to full compliance by the Company, its subsidiaries and affiliates, and its officers, directors, employees and agents with any anti-bribery or anti-corruption laws that may be applicable within the countries we operate.

Compliance with the policies and procedures set forth in this Policy is mandatory. Violations will result in disciplinary action, which may include termination of employment. Violation of this Policy also can lead to civil and criminal penalties, including fines or imprisonment for the individuals involved. The individuals and entities to whom this Policy applies must therefore familiarise themselves with the Policy, seek guidance where they have any questions about the Policy, and report any suspected violations of this Policy within 48 hours to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw)

## Policy Statement

Lanforce (together with its subsidiaries, Stakeholders and Partners) is subject to various anti-bribery laws, including the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977, and the local anti-corruption laws in all of its operational countries. Lanforce (together with its subsidiaries, Stakeholders and Partners) must comply with all Anti-Bribery Laws at all times.

Taken together, the Anti-Bribery Laws prohibit Lanforce (together with its subsidiaries, Stakeholders and Partners) from:

- offering, promising, giving or authorising any payment or other benefit to a Public Official<sup>1</sup> intending to obtain or retain business or secure some other business-related advantage by influencing them in their capacity as a Public Official;
- offering, promising, giving or authorising any payment or other benefit to an individual, other than a Public Official, that is intended to cause or reward that person for acting in an illegal or unethical way in the carrying out of business-related activities; and
- requesting, agreeing to accept, or accepting any payment or other benefit that is intended to reward them for acting in an illegal or unethical way in the carrying out of their functions for, or is otherwise related to the business of, Lanforce (together with its subsidiaries, Stakeholders and Partners).

The Anti-Bribery Laws prohibit more than monetary payments. Offering, promising, giving or authorising the transfer of any benefit or advantage for an improper purpose is prohibited to the same extent as offering, promising, giving or authorising a monetary payment for an improper purpose. Even providing hospitality or entertainment may be held to violate the Anti-Bribery Laws if the hospitality or entertainment is deemed to have been excessive, thereby suggesting that it was offered or provided for a prohibited purpose or was likely to have a prohibited effect on the recipient.

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<sup>1</sup> The term "Public Official" includes elected or appointed officials at all levels of government, as well as anyone who is employed by a national, regional or local government, or a government-owned or controlled entity (e.g. a state owned enterprise); employees of international public organisations (e.g. the United Nations, the World Bank, and other international development agencies); and political parties, political party officials, and candidates for public office.

Lanforce (together with its subsidiaries, Stakeholders and Partners) can incur severe administrative, civil and criminal penalties if it is found to have offered, accepted or benefited from a bribe. Individual Representatives can also incur severe civil and criminal penalties, including fines and imprisonment, if they are found to have offered, accepted or benefited from bribes. Connivance or complicity in bribery, or wilful blindness to bribery, can lead to similar penalties.

If a Representative is confronted by a potential violation of this Policy or the Anti-Bribery Laws (for example a solicitation for a bribe from a Public Official), he/she must avoid such potential violation and report the matter to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw) within 48 hours. Any such reports will be accurately recorded in the Lanforce anti-bribery records, which will be subject to Board level review.

## Facilitation Payments

A facilitation payment or "kickback" is a payment that is made to speed up a routine, non-discretionary government action, such as processing a visa, securing a mail service, or connecting utilities. Facilitation payments are bribes and will expose Lanforce (together with its subsidiaries, Stakeholders and Partners) to a risk of prosecution. They are therefore prohibited.

The prohibition does not apply to modest and customary tips that are given to service employees in state-owned establishments, such as porters in state-owned hotels or servers in state-owned restaurants.

Any request for a facilitation payment must be resisted. Any activity that might lead to a facilitation payment being made or accepted by Lanforce (together with its subsidiaries, Stakeholders and Partners), or that might suggest that such a payment will be made or accepted, must be avoided. If a payment which could be considered a facilitation payment is requested or made the details of any such payment must be submitted in writing to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw) within 48 hours of the request or the payment being made. Any such incidents must be accurately recorded in the Lanforce anti-bribery records, which will be subject to Board level review. Any such payments must be accurately recorded as facilitation payments in the Lanforce (together with its subsidiaries, Stakeholders and Partners) accounting books and records.

## Gifts, Hospitality and Other Business Courtesies

Representatives may only give gifts, or provide hospitality or other business courtesy, on behalf of Lanforce (together with its subsidiaries, Stakeholders and Partners) if the gift, hospitality or business courtesy is:

- legal under written local law;
- in accordance with local business custom;
- de minimis in value;
- not designed to influence the recipient;
- infrequent;
- appropriate for the occasion; and
- of a nature that would not embarrass Lanforce (together with its subsidiaries, Stakeholders and Partners) if publicly disclosed.

No gift, hospitality or business courtesy, no matter how small, may be provided if the gift is intended to or could reasonably be expected to affect the outcome of a government decision or business transaction, confer any other advantage on Lanforce (together with its subsidiaries, Stakeholders and Partners) or otherwise create the appearance of impropriety.

**No Representative may give to any recipient:**

- gifts worth more than USD 50 each in the aggregate over a one-year period. Gifts of cash or cash equivalents (such as gift certificates or securities) are prohibited under all circumstances; or
- hospitality or other business courtesies worth more than USD 100 per event in the aggregate over a one-year period.

**Representatives are prohibited from:**

- accepting or receiving any gift, hospitality or other business courtesies that could influence, or be perceived to influence, their business decisions on behalf of Lanforce (together with its subsidiaries, Stakeholders and Partners) or place them in a position to derive a direct or indirect benefit from a party having business dealings with Lanforce (together with its subsidiaries, Stakeholders and Partners) or
- accepting any gifts, hospitality or other business courtesies in any event with a value in excess of USD 50. If any gift, hospitality or other business courtesy with a value greater than USD 100 is received, the recipient must report the gift, hospitality or other business courtesy to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw) within 48 hours who will determine whether the gift should be

returned, or whether the individual or entity that provided the hospitality or other business courtesy should be reimbursed for the expense.

Representatives may never ask for gifts, hospitality or other business courtesies from individuals or entities doing business, or seeking to do business, with Lanforce (together with its subsidiaries, Stakeholders and Partners). Unsolicited gifts, hospitality and business courtesies, including meals and entertainment, are acceptable if they are:

- customary;
- infrequent;
- commonly accepted business courtesies;
- not excessive in value; and
- given and accepted without an express or implied understanding that the recipient is in any way obligated by the acceptance of the gift.

Gifts of cash or cash equivalents (such as gift certificates or securities) are prohibited under all circumstances.

Representatives must declare in writing to Lanforce Ethics Alert line at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw) within 48 hours of all hospitality or gifts offered, given or received and any such incidents must be accurately recorded in the Lanforce anti-bribery records, which will be subject to Board level review.

## Charitable Donations

Charitable donations may never be made on behalf of Lanforce (together with its subsidiaries, Stakeholders and Partners) as part of an exchange of favours with any individual or business, including Public Officials, even if the recipient organisation is a legitimate charity. No donation must be offered or made without the prior approval of the board of Lanforce (together with its subsidiaries, Stakeholders and Partners) and the making or offering of any donation must be accurately recorded in Lanforce anti-bribery records.

## Political Contributions

Political contributions on behalf of Lanforce (together with its subsidiaries, Stakeholders and Partners) to political candidates, political parties and political party officials are strictly prohibited. This prohibition covers contributions of any kind, including cash, loans, gifts, membership fees

and all other non-cash contributions, including in-kind contributions such as office supplies, the use of office space, and other non-cash items or services.

Representatives may not agree to any request for a political contribution on behalf of Lanforce (together with its subsidiaries, Stakeholders and Partners). Neither may they cause Lanforce (together with its subsidiaries, Stakeholders and Partners) to make payments to lobbying firms, charities, agents, contractors or others as a way of circumventing the ban on political contributions.

The prohibition on Lanforce (together with its subsidiaries, Stakeholders and Partners) political contributions are not intended to prevent Representatives from engaging in approved lobbying activities for the benefit of Lanforce (together with its subsidiaries, Stakeholders and Partners) or restrict the right of Representatives to make personal political contributions or otherwise participate in personal political activities on their own time and using their own resources.

Any solicitation for political contributions must be declared in writing to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw) within 48 hours and any such incidents must be accurately recorded in the Lanforce anti-bribery records, which will be subject to Board level review.

## Whistle-blowing

Any Representative who becomes aware of an actual or potential violation of this Policy or the Anti-Bribery Laws by another Representative or Lanforce (together with its subsidiaries, Stakeholders and Partners) must report the matter to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw). The report must be made promptly upon the Representative becoming aware of the actual or potential violation, and in any event within two business days.

## Policy Development and Implementation

The senior managers of the Company have overall responsibility for the development and implementation of this Policy. This responsibility extends to ensuring the existence of appropriate and regular training for Representatives.

Compliance with the Policy shall be audited by the Board Internal Audit and Risk at the commencement of this Policy and at least every year thereafter.

Lanforce (together with its subsidiaries, Stakeholders and Partners) has a zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and

business partners at the outset of the business relationship with them and as appropriate thereafter. Suitable anti-bribery and corruption provisions must be included in the contracts and agreements with such suppliers, contractors and business partners.

## Record Keeping

Lanforce (together with its subsidiaries, Stakeholders and Partners) must keep financial records and have appropriate internal controls in place which will evidence the business reason for making all payments.

Representatives must declare all hospitality or gifts accepted or offered and all violations or circumstances of potential violation of this Policy or the Anti-Bribery Laws to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw) within 48 hours. Any such reports must be accurately recorded in the Lanforce anti-bribery records, which will be subject to Board level review.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as suppliers, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

*Should you have any questions or concerns regarding these guidelines, please contact [ethics@lanforce.co.zw](mailto:ethics@lanforce.co.zw)*