



**Anti Bribery & Corruption Policy
of
Midland Power Co. Ltd.**

January 2017

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Introduction

Midland Power Co. Ltd. is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Midland's behalf is responsible for conducting company business honestly and professionally.

Midland considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

Midland benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors.

Midland does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery and corruption, in accordance with the Anti-Corruption Act 2016 (Amended)

Policy

The aim of this policy is to help the Company act in accordance with the Anti-Corruption Act 2016 (Amended), maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery and corruption.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

Company Responsibility

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility:

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.

- Offer any financial or other reward from any person in return for providing some favour.

Non Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company senior management. However, all employees are required to adhere to and support the implementation of the policy. The Company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.

This Policy was approved & authorized by:

Name: Feroz Alam

Position: Managing Director

Date: January 2017

Signature:

A handwritten signature in purple ink, appearing to read 'Feroz Alam', is written over a horizontal line.