



## COMPLIANCE POLICY

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### **1 WHAT WE BELIEVE**

eleQtra is committed to acting ethically, professionally and with integrity in all its business dealings and relationships wherever it operates.

This is more than just following rules. As well as complying with all laws and regulations we must apply our principles and values. We must all ask ourselves, "Is this the right thing to do? Is this what eleQtra stands for?"

Our policy commitment provides a framework within which to make decisions. By applying good judgement to the principles set out here, we can all uphold eleQtra's reputation and safeguard its future. Our reputation is our key asset. It is hard won but easily lost.

### **2 WHO THIS POLICY APPLIES TO**

eleQtra's Compliance Policy applies to all its full-time and part-time employees and temporary staff at all its business locations around the world.

We are also committed to working only with third parties whose standards are consistent with our own. This includes joint venture partners, customers, contractors and suppliers.

### **3 COMMITMENTS**

The following commitments form the basis of our Compliance Policy

#### **3.1 Laws**

eleQtra will comply with all laws in all jurisdictions in which it operates.

#### **3.2 Health and Safety**

We make health and safety our first priority for everyone who works for or with us.

#### **3.3 Fraud, Deception and Dishonesty**

We will not defraud or deceive anyone or act dishonestly, and will protect eleQtra against fraud.

#### **3.4 Bribery**

We refuse to offer, give or receive bribes or improper payments, or participate in any kind of corrupt activity, either directly or through any third party.

#### **3.5 Facilitation Payments**

We will not make facilitation payments in any countries in which we do business, and we will not allow others who work for us to make them.

### **3.6 Gifts and Hospitality**

We will make sure that gifts and hospitality are reasonable, and we never offer or accept them if they may improperly influence a business decision or impair independence or judgement.

### **3.7 Conflicts of Interest**

We avoid situations in which our personal interests or actions could conflict with eleQtra's best interests.

### **3.8 Subsidiaries and Affiliates**

We ensure that all of eleQtra's subsidiary companies and affiliates respect and comply with this policy.

### **3.9 Relationships with Third Parties**

We only work with organisations if they are known to act to standards consistent with our own.

We treat these organisations and their staff with integrity and professionalism at all times.

### **3.10 Developing Our People**

We are committed to helping our people achieve their best, by enabling them to develop and succeed.

### **3.11 Equal Opportunity and Diversity**

We treat everyone equally and embrace difference. We employ and promote solely on merit and contribution.

### **3.12 Harassment, Bullying or Discrimination**

We do not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us.

### **3.13 Human Rights**

We respect and protect human rights. These include the right of life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion. We refuse to do business with any organisation that fails to uphold these standards.

### **3.14 Respecting the Environment**

We care about the natural world and recognise our responsibility to work in an environmentally responsible manner.

### **3.15 Respecting Communities**

We respect the communities around us. Wherever we work we contribute positively to the communities through the services we provide and the lasting infrastructure we work to develop.

### **3.16 Procedures**

We will implement appropriate procedures to help ensure that this policy is complied with.

**12 August 2013**

**CONFIRMATION OF EMPLOYEE / DIRECTOR<sup>1</sup>**

Attention: Compliance Officer  
c/o eleQtra (InfraCo) Limited

I confirm that I have read and understand eleQtra's Compliance Policy dated 12 August 2013.

I undertake to comply with all of the principles and standards contained in the Compliance Policy, and with all eleQtra's procedures implemented to help ensure compliance with this policy.

Signature.....

Name.....

Date.....

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<sup>1</sup> This confirmation should be signed by each new employee, director or officer of eleQtra. It should also be signed annually if the Compliance Policy is updated/changed.