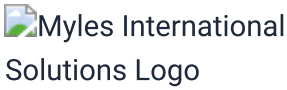
CORPORATE POLICY — MISL-POL-ABAC-03

Anti-Bribery, Anti-Corruption (ABAC) & Business Ethics Policy



Myles International Solutions Limited (RC 1687677) | Port Harcourt, Rivers State, Nigeria

Policy ID: MISL-POL-ABAC-03 | **Statutory Alignment:** ICPC Act, UK Bribery Act 2010, US FCPA | **Custodian:** Managing Director / CEO

Zero-Tolerance Integrity Mandate: To qualify for and maintain authorized agency agreements with tier-1 international OEMs (Germany, UK, Netherlands, USA) and multinational IOCs, Myles International Solutions Limited (MISL) enforces an absolute Zero-Tolerance Policy toward bribery, extortion, kickbacks, and facilitation payments across all jurisdictions.

1. STRICT PROHIBITION OF IMPROPER PAYMENTS & FACILITATION

- **Public Officials & Regulators:** No MISL director, employee, consortium representative, or agent may offer, promise, give, or authorize money, gifts, travel, entertainment, or anything of value to officials of NUPRC, NCDMB, Nigerian Customs Service (Onne/Port Harcourt), FIRS, or state agencies to expedite permits, waive duties, or influence regulatory decisions.
- **Commercial Bribery & Kickbacks:** Offering secret commissions, inflated agency fees, or personal kickbacks to procurement officers, engineers, or tender evaluators at Seplat, TotalEnergies, Mobil, Renaissance, or Ronngate Limited is strictly prohibited.
- **Facilitation Payments Prohibited:** Small unofficial payments ("grease payments") demanded to speed up routine administrative, port clearance, or inspection actions are illegal under the UK Bribery Act 2010 and strictly forbidden by MISL. Any demand for a facilitation payment must be refused and logged immediately.

2. GIFTS, HOSPITALITY & CONFLICTS OF INTEREST

- **Strict Gift & Hospitality Limits:** Corporate gifts and business hospitality must be modest, customary, transparent, infrequent, never offered or accepted during an active tender evaluation window, and logged in MISL's Compliance Register. Cash, gift cards, or cash equivalents are unconditionally prohibited.
- **Mandatory Conflict Disclosure:** All employees and directors must disclose any familial, financial, or board relationship with client personnel, regulators, competitors, or Port Harcourt subcontractors prior to participating in any commercial transaction.

3. THIRD-PARTY DUE DILIGENCE & WHISTLEBLOWING

- **Mandatory Intermediary Vetting:** Every customs broker, freight forwarder, consultant, and Port Harcourt workshop subcontractor must pass ABAC screening and sign MISL's *Anti-Corruption Compliance Undertaking* prior to receiving a Purchase Order or representing MISL.
- **Protected Reporting & Sanctions:** Employees must report suspected bribery or ethical breaches directly to the Managing Director or via `compliance@myleslimited.com` without fear of retaliation. Violations result in immediate termination of employment or contract and referral to law enforcement authorities.

4. ABAC RISK & COMPLIANCE CONTROL MATRIX

High-Risk Touchpoint	Prohibited Conduct	Mandatory MISL Control
Customs & Port Clearance	Paying unofficial "speed money" to clear OEM cargo at Onne Port or PHC Airport.	Use only ABAC-certified customs brokers; pay official government duties strictly via bank assessment receipts.
IOC & Consortium Tenders	Providing undisclosed commissions, gifts, or hospitality during active bid evaluation.	Freeze all gifts/hospitality during tender windows; maintain transparent, auditable pricing schedules.
NUPRC & NCDMB Filings	Offering inducements to accelerate OGISP permit or Nigerian Content Plan approvals.	Submit complete, compliant dossiers through official portals; pay statutory fees exclusively via Remita/official channels.

5. EXECUTIVE PROMULGATION & APPROVAL

Approved & Promulgated By:	**Compliance & Register Custody:**
Andrew Okechukwu Okwedadi Managing Director / Chief Executive Officer Myles International Solutions Limited	**Betty Nkem Opara** (HR Manager) / **Office of the MD** UK Bribery Act & US FCPA Compliance Registry Document Control Ref: MISL-POL-ABAC-03-REV2