



# Third Party Guidelines

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September 2016

## 1. Purpose and scope of application

Julius Berger Nigeria Plc (JBN) has committed itself to complying with the principles of ethical conduct, integrity, and compliance with the law. The JBN Code of Conduct, as well as the principles of the Global Compact Initiative of the United Nations, are mandatory requirements imposed on all employees at JBN.

JBN expects its contractors to act with integrity and to conduct themselves in compliance with the laws and in an ethical manner, in keeping with the principles of the Global Compact Initiative and the minimum standards set out hereinbelow. JBN has made it its mission to work together exclusively with those business partners whose commitment to these principles is bona fide and sustained.

In this context, the term “contractor” is to be given a broad definition; it comprises the entirety of all persons and enterprises who/which deliver goods or provide services to JBN. In cases of doubt as to whether or not a business partner should be classified as a contractor, that business partner is to be subject to the Third Party Guidelines.

## 2. Addressees

The present Guidelines address the employees responsible for awarding contracts, respectively concluding agreements.

## 3. Implementation

Agreements with contractors are to define the counter-performance to be provided by the contractual partner in a clear and unequivocal, specific manner.

The remuneration the contractor is to receive, as well as the specific performance to be so remunerated, are to be clearly documented at the time the agreement is concluded.

Where agreements are concluded with contractors, it is to be ensured that they are familiar with the Code of Conduct for JBN contractors, and that they honor and accept it.

- Agreements with contractors who, in the broadest sense of the term, are acting for JBN or on behalf of JBN vis-à-vis third parties, or who provide services to third parties on behalf of JBN, are to include a Compliance clause that includes the Code of Conduct for suppliers and service providers by reference and obligates such contractors to comply with it.
- Should contractors be active on behalf of JBN directly vis-à-vis third parties, particular care must be taken to ensure their reliability and that they conduct themselves with integrity. Where there are any doubts as to their conducting themselves in keeping with the rules and regulations in place, such doubts are to be escalated immediately to the direct supervisor and/or the Chief Compliance Officer.

All other contractors, namely suppliers of goods, for example, are to be given a copy of the Code of Conduct, and it is to be included in the documentation by reference.

Where a contractor suggests that a change be made to the Compliance provisions as set out in the Code of Conduct for suppliers and service providers, or suggests a Compliance provision of its own, or a comparable obligation, this is to be coordinated with the Chief Compliance Officer.

Should the contractor refuse to acknowledge the Code of Conduct, or to agree on a comparable Compliance regulation, then no agreement is to be concluded with that contractor.

#### **4. Disclosure**

In order to maintain transparency, this policy is to be publicized in the internal communications of the Company and the website in a manner consistent with its disclosure policy.

#### **5. Modifications**

The Management is responsible for making modifications to the present Guidelines. The present Guidelines will be reviewed regularly to verify its continued ability to be applied.

#### **6. Contact person**

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