Boafo Nsa

CIVIL WORKS · GHANA

BN-POL-02

VERSION 1.0

CORPORATE POLICY

Anti-Bribery, Anti-Corruption and Fair Tendering Policy

EFFECTIVE DATE	VERSION	NEXT REVIEW
11 August 2026	1.0	12 months after approval

POLICY OWNER	APPROVED BY
Compliance Officer	Board of Directors, [date]

APPLIES TO

Boafo Nsa Ltd and anyone acting on its behalf

01 Policy statement

Boafo Nsa has zero tolerance for bribery and corruption. We will not offer, promise, give, request or accept a bribe in any form, whether directly or through a third party. We would rather lose a contract than win it improperly, and we will not pay to obtain permits, certificates, interim payments or site access.

02 Why this matters in construction

Construction is one of the sectors most exposed to corruption: large public contracts, many permits and inspections, cash-heavy site operations and long subcontracting chains. A single improper payment can lead to debarment by the Public Procurement Authority, loss of donor-funded work, criminal prosecution and unsafe structures built to falsified certificates.

03 Legal framework

Boafo Nsa complies with all applicable anti-corruption laws, including:

- Criminal Offences Act, 1960 (Act 29)
- Office of the Special Prosecutor Act, 2017 (Act 959)
- Public Procurement Act, 2003 (Act 663), as amended by Act 914 of 2016
- Anti-Money Laundering Act, 2020 (Act 1044)

- The anti-corruption and sanctions rules of development finance institutions and multilateral lenders, including World Bank and African Development Bank debarment regimes, where they fund our work

The policy is designed in line with ISO 37001 (Anti-bribery management systems).

04 Definitions

- **Bribe:** anything of value (money, gifts, fuel, materials, jobs, free work on private property, favours) offered or given to improperly influence a decision or obtain an advantage.
- **Public official:** anyone working for a ministry, department, agency, district or municipal assembly, state-owned enterprise or public international organisation, including tender evaluators, consultants acting as the Engineer, and inspectors.
- **Facilitation payment:** a small unofficial payment to speed up a routine action, such as a permit, a utility connection, release of goods at port or signing a measurement sheet.

05 Prohibited conduct

Personnel and associated persons must never:

01 Offer, promise or give a bribe to any person, public or private

02 Request or accept a bribe, including from subcontractors or suppliers seeking orders or payment

03 Make facilitation payments, even where they are customary or small

04 Pay "percentages" or "thank-you" sums to obtain contract awards, certificates or the release of payments

05 Carry out free or discounted work on the private property of an official, consultant or client representative

06 Use a third party, relative or charity to do any of the above indirectly

07 Falsify or hide records to disguise an improper payment

Exception for personal safety: where a payment is demanded under threat to a person's life, health or liberty, safety comes first. The payment must be reported to the Compliance Officer within 24 hours and recorded accurately.

06 Fair tendering

- We prepare tenders honestly, with genuine prices, real equipment lists and the actual qualifications of key staff.
- We do not collude with other bidders, agree to rotate wins, submit cover bids or share pricing.
- We do not seek or use confidential information about competing bids or the evaluation.
- We do not hire a public official involved in a tender, or their relatives, while the tender is live.
- Any approach suggesting that an award can be "arranged" must be refused and reported.

07 Gifts and hospitality

SITUATION	RULE
Value up to GHS [500] per person	Permitted; no approval needed

SITUATION	RULE
Value above GHS [500]	Prior approval by the Compliance Officer; record in the Register
Any gift or hospitality to or from a public official or the Engineer's staff	Prior approval by the Compliance Officer; record in the Register
Cash or cash equivalents (vouchers, mobile money, fuel coupons)	Never permitted
During an active tender, evaluation, certification or permit process with that party	Never permitted

Customary gifts at funerals, weddings and festivals are acceptable within these limits and must be modest and given openly. The Compliance Officer keeps a Gifts and Hospitality Register, reviewed quarterly.

08 Third parties

Before engaging an agent, consultant, subcontractor or supplier who may deal with officials or clients for us, we will:

- Carry out risk-based due diligence on ownership, reputation, capability and links to public officials
- Pay fees that are reasonable, linked to documented work and paid only to a bank account in the provider's own name
- Include anti-corruption, audit and termination clauses in the contract
- Require written acceptance of the Subcontractor and Supplier Code of Conduct (BN-POL-14)

09 Money laundering and sanctions

We do not accept payment from unknown third parties or in large cash sums, and we verify the identity of clients and partners on private developments. We screen significant partners against UN and other applicable sanctions lists. Suspicious transactions are reported to the Compliance Officer, who decides whether to report to the Financial Intelligence Centre.

10 Books, records and site controls

All payments must be authorised, supported by invoices and accurately recorded. Payments above GHS [50,000] need dual authorisation. Site cash is limited to an imprest with receipts. Fuel, cement, steel and other high-value materials are tracked through stores records and reconciled monthly.

11 Red flags

Report to the Compliance Officer if, for example:

- Someone offers to "help" with an award or a delayed payment for a fee
- A subcontractor is recommended or required by an official
- An agent asks for cash, a high commission or payment to another person's account
- Measured quantities or certificates differ from what was built

- A party refuses anti-corruption clauses or to disclose its owners

12 Training

All staff complete anti-corruption training on joining and every year. Estimators, procurement staff, quantity surveyors, project managers and anyone dealing with officials receive additional training.

13 Reporting and protection

Concerns must be reported through the channels in the Whistleblowing Policy (BN-POL-04). No one will suffer retaliation for refusing to pay a bribe or for reporting in good faith, even if Boafo Nsa loses business as a result.

14 Breaches

Breach of this policy is gross misconduct and may lead to dismissal or termination of contract. Boafo Nsa will cooperate with the Office of the Special Prosecutor and other authorities.

15 Monitoring and review

The Compliance Officer reports to the Board at least annually on corruption risks, gifts and hospitality, third-party checks, training and incidents. This policy is reviewed at least every 12 months.

END OF DOCUMENT