

The East African Crude Oil Pipeline (EACOP) Limited rejects all forms of bribery and corruption.

The company maintains a zero-tolerance policy and is committed to conducting all business and operations honestly and ethically. This policy applies to all EACOP staff, including direct employees, secondees employees, and contract staff. The same standards are expected from all those working on behalf of EACOP, including agents, representatives, suppliers, contractors, and joint venture partners.

Employees must comply with applicable laws, the anti-bribery and corruption compliance program, and the code of conduct, which require adherence to the rules outlined below.

It is our policy to ensure that:

#### **THIRD PARTY DUE DILIGENCE**

A risk-based assessment is carried out before engaging any third party, such as suppliers, agents, or contractors, to ensure they meet EACOP's compliance, integrity, and ethical standards.

#### **GIFTS AND HOSPITALITY**

Whether offered or accepted, gifts and hospitality must be reasonable, proportionate, legal, and recorded in accordance with internal procedures to prevent undue influence.

#### **EXPENDITURE RELATED TO PUBLIC OFFICIALS**

All expenses involving public officials must be pre-approved by the compliance team and must fully comply with anti-bribery and corruption laws to avoid being misinterpreted as improper payments.

#### **SOCIAL FUNDS, CONTRIBUTIONS AND SPONSORSHIPS**

Any funding provided to communities or external organizations must undergo due diligence and regular monitoring to ensure it is transparent, traceable, and used for legitimate purposes only.

EACOP management affirms its commitment to implementing the zero-tolerance stance on corruption and bribery. All EACOP staff are required to adhere to the EACOP compliance policy and related procedures.

#### **CONFLICT OF INTEREST**

All EACOP personnel are required to declare any actual, potential, or perceived conflicts of interest so they can be properly assessed and managed in line with company policy.

#### **HUMAN RESOURCES GUIDELINES**

The anti-corruption compliance program must be integrated at every stage of the recruitment process and implemented throughout the employees' career management process.

#### **COMPLIANCE TRAINING AND AWARENESS**

All staff must complete regular and mandatory training to understand the compliance program, code of conduct, legal requirements, and how to apply them in their role.

#### **ACCURATE ACCOUNTS AND RECORDS**

EACOP ensures all financial records, transactions, and reports are accurate, transparent, and maintained in line with internal controls and legal obligations.

#### **MONITORING AND REVIEW**

The compliance program is regularly reviewed through risk-based assessments to ensure effectiveness and address gaps or emerging risks.

#### **WHISTLEBLOWING AND INVESTIGATIONS**

Secure, confidential reporting channels are available to raise concerns. Reports are investigated promptly, and protection is provided against retaliation.

#### **SANCTIONS**

Violations of compliance rules may result in disciplinary measures, termination of employment, and legal consequences, including criminal charges.

#### **DOCUMENT CONSERVATION**

All documents related to compliance activities must be stored and maintained according to EACOP's document conservation policy.