



BURGE AL WEAAM Co.
General Contracting Ltd.

**BURGE AL-WEAAM COMPANY
FOR GENERAL CONTRACTING
LIMITED**

Doc. No.:
BAC-HR-ST-0008

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DONATION AND SPONSORSHIP POLICY

Rev.	Date	Description	Prepared by	Checked by	Approved by
0	15 th April 2024	Issued For Implementation	Alaa Ibrahim	M. Kashmola	Dheyaa Mohammed
A	13 th Mar. 2024	Issued for Review	Alaa Ibrahim	M. Nashaat	M. Kashmola



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Document No: BAC-HR-ST-0008

Revision: 0

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Revision History

REV.	DATE	DESCRIPTION OF CHANGE
0	15/4/2024	Issued For Implementation
A	13/3/2024	Issued For Review



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Purpose

This policy governs donations made BACO, Employees, Directors or Third Parties acting in a business capacity for and on behalf of BACO.

This Policy also sets out the circumstances in which BACO may make sponsorships to individuals or entities, including in relation to events.

This Policy should be read in conjunction with BACO's Anti-Bribery and Corruption Policy, BACO's Code of Conduct and Business Ethics.

Scope

This policy applies to all executives, employees and contractors of BACO.

Definitions

BACO	Burg Al-Weam Company
Director	a director appointed by BACO.
Employee	any individual working at any level or grade, including officers, senior managers, trainees, interns, of BACO, whether full-time, part-time, permanent, fixed-term or temporary.
Head	in relation to an Employee, the head of a department, General Manager, an Executive Vice President, a Senior Executive Vice President, Chief Operating Officer or Chief Executive Officer, within the Employee's reporting line.
Pubic Official	an individual who: (i) holds a legislative, administrative or judicial position of any kind; or (ii) who performs public duties or exercises a public function for or on behalf of the government or for any public agency or enterprise (including government linked companies and enterprises, and state-owned or state-controlled companies and enterprises); or (iii) is an official or an agent of a public international organization (such as the United Nations or similar body).
Sponsorship Register	a register to be implemented and maintained by BACO for the purpose of this Policy.
Third Party	anyone who at any time performs (or who is intended to perform) services for or on behalf of BACO, including anyone who is engaged (by contract or otherwise) or paid to represent BACO such as suppliers, distributors, business contacts, agents, representatives, intermediaries, middlemen, introducers, sponsors, consultants, contractors, advisers, and potentially Public Officials.
You / Your	any person subject to this Policy



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The Policy

Any donation and /or sponsorship shall be carried as per described below:

Political Donation

- 1- BACO its Employees, Directors or Third Parties are not permitted, under any circumstances, to make donations (in cash or in kind) in respect of any political activities, including donations to political candidates, political officials, political parties or political fund organizations on behalf BACO. In kind contributions could include participation in political campaigns during paid working hours and / or the use of administrative support, BACO facilities, equipment and supplies.
- 2- If you become aware or have reason to suspect that an Employee or Director of BACO or a Third Party may have made or may intend to make a political donation on behalf of BACO, this must be reported to the Human Resources Department.
- 3- Notwithstanding the above prohibition, all Employees and Directors of BACO and Third Parties remain entitled to participate in the political process in their individual capacity and not as a representative of BACO. Any decision to do so is entirely personal and voluntary and is a private matter.
- 4- When engaged in political activities, all Employees and Directors of BACO and Third Parties are expected to do so as private individuals, and at all times must make it clear that their views and actions are their own, and not those of BACO.
- 5- Employees and Directors of BACO and Third Parties must not use their position within BACO to coerce or pressure other Employees or Directors or Third Parties to make contributions to or support or oppose any political candidates, political officials, or political parties.

Charitable Donations

- 1- BACO is proud of its strong commitment to the communities in which it operates. While charitable contributions are encouraged, all contributions must be made in accordance with our high ethical standards and in compliance with all applicable laws.
- 2- Charities regularly have connections to Public Officials and current or prospective business partners and vendors. In some circumstances, there is therefore a risk that charitable donations can be intended to improperly influence certain individuals or entities who have a connection to the charity in question. As such, charitable donations are a potential risk area for violations of BACO's Anti-Bribery and Corruption Policy.
- 3- In particular, charitable donations by BACO in its own name should be made with the following objectives in mind:

- a- Performing initiatives which cater for the relief of distress amongst individuals and/or organizations affected by epidemics of diseases, natural disasters or other similar emergencies.
 - b- Providing assistance in meeting the needs of individuals who are underprivileged, disabled, poverty stricken or critically ill.
- 4- In addition to the charitable activities set out above, BACO may on occasion make donations to an independent charitable foundation.
- 5- A charitable donation should never be made if:
- I. It is an indirect way of conferring a personal benefit on a Public Official, Third Parties, politicians, political party or its official or, the respective family members, relatives, representatives and/or business partners of any Public Official, Third Parties, politicians or political party official.
 - II. There is an expectation that something will be given in exchange (for example a purchasing or other decision affecting BACO's interests).
 - III. It is made as part of a bid for a contract.
 - IV. It is not given directly in good faith and is not reasonable in value and frequency.
 - V. It is not in compliance with applicable laws, rules and regulations.
 - VI. It is not given in an open and transparent manner.
 - VII. The receiving organization has not had satisfactory due diligence checks and searches carried out on it by BACO to confirm that the receiving organization is a valid organization and will use the charitable donation in accordance with the objectives as set out in this policy (and in particular, Charitable Donation item 3 above in respect of donations made and that there are no conflicts of interest or apparent risks of unethical or corrupt behavior.

Sponsorships

- 1- Sponsorships differ from donations (whether political or charitable), although the same considerations apply to both sponsorships and donations. A sponsorship is the grant of a right to associate BACO's name, products and services with the sponsored individual or organization's service, product or activity in return for negotiated benefits. This right may be obtained through financial contributions or the provision of in-kind goods or services. The sponsored party may be an individual or an entity and the sponsorship may relate to the organization of an event.
- 2- The provision of sponsorships may, however, in some circumstances, give rise to the risk that its provision may be intended – or perceived to be – for the obtaining of an improper advantage. Therefore, care must be taken to ensure that any sponsorship activities do not create, or appear to create, an improper advantage for BACO.

- 3- The following principles should apply to sponsorships given by BACO:
 - I. The sponsorship must not be made in conjunction with, as part of, or in relation to the negotiation of any bid, tender, contract renewal or prospective business relationship with parties associated with the receiving individual or entity;
 - II. The sponsorship will not be used directly or indirectly to improperly influence any person's act or to make a decision in favor of BACO, including in the granting of licenses, permits or approvals;
 - III. The sponsorship should be intended to enhance BACO's institutional image, reputation and standing. There should not be any apparent risk to BACO's reputation and standing arising from the sponsorship;
 - IV. There should not be any conflict of interest, or any perceived conflict of interest, between BACO, its Employees and/or Director and the sponsored individual, entity or event;
 - V. BACO must assess the specific obligations that must be undertaken as result of the sponsorship prior to the grant of the sponsorship;
 - VI. The level of sponsorship provided should correspond with the level of benefit received by BACO, which can include the enhanced institutional image, reputation and standing of BACO;
 - VII. BACO forbids any Employee or Director directly or indirectly from providing any sponsorship in the course of his/her employment as a way to obtain a personal advantage in a commercial transaction; and
 - VIII. The sponsorship must not be made in relation to any political activities.
- 4- BACO may exercise its discretion to provide sponsorship to an individual or entity, including in relation to an event. However, commercial justification for the sponsorship must be provided. The following considerations are non-exhaustive and may apply to BACO's decision as to how sponsorships should be granted:
 - I- The sponsorship may result in the generation of sales for BACO's properties;
 - II- The perceived improvement or strengthening of BACO's institutional image and its developments from the perspective of BACO's targeted audience;
 - III- The perceived improvement or strengthening of BACO's institutional image via positive media relations and coverage of BACO's developments, products and services; or
 - IV- The strengthening of BACO's institutional image and presence within the industry.
- 5- BACO must not use sponsorships to strengthen general relationships for improper or corrupt purposes. The granting of sponsorships is subject to due diligence and must be analyzed by the authorized Employees within the relevant department, in

consultation with HR. The Employees responsible for the conduct of due diligence and reviewing of sponsorship requests should have consideration of the following:

- I- An understanding of how the sponsorship will be used. In addition, the relevant Head responsible for raising the sponsorship application must be satisfied that the sponsorship will not be used directly or indirectly to improperly influence any person's act or to make a decision in favor of BACO. In particular, it should be clear at the outset that BACO will not be receiving any benefit other than those derived from its association as sponsor with the individual, entity or event;
 - II- Whether there are any current, pending or potential business relationships with any parties associated with the receiving individual or entity and the risks of whether the sponsorship activity would create, or appear to create, an improper advantage to BACO, its director and/or Employees;
 - III- Whether any possible conflicts of interest may arise from any current, pending or potential business relationships between BACO, its director and/or Employees with the receiving individual or entity or parties associated with it;
 - IV- Whether the receiving entity's culture or ethical values are aligned with BACO's;
 - V- Whether there is a history of bribery-related issues or other irregularities involving the receiving individual or entity;
 - VI- The mode in which the sponsorship will be paid, e.g. will the sponsorship be paid via bank transfer to a bank account in the name of the receiving individual or entity and in which country location; and
 - VII- Whether the amount of sponsorship commensurate with the stated purpose of and anticipated benefits from the sponsorship.
- 6- If it is discovered upon conducting due diligence on the receiving party that it is affiliated with a government-related entity, Public Official, political candidate, political official, and/or political party or in respect of any political activities, such affiliations or activities should be fully and accurately disclosed including details relating to government department/branch or political party; the nature of the affiliate's control and extent of ownership of the receiving party, the key officers and directors of the affiliate and any other relevant information; and whether there are any ongoing or contemplated transactions or applications for the granting of licenses, permits or approvals with the relevant government entity or Public Official.
- 7- The relevant Head responsible for the sponsorship application shall record or ensure that the sponsorship, on approval, shall be recorded in the Sponsorship Register. The Sponsorship Register shall be monitored by the HR. The HR will provide further information in respect of the Sponsorship Register under the standard operating procedure on sponsorships.

- 8- For further information on BACO’s existing framework and guidelines on the approval of sponsorships, please refer to the applicable standard operating procedure.

Reporting

If a current or prospective business partner, customer, Public Official, charitable organization, political candidate or party official promises or offers any benefit, or makes any threat, in connection with a donation (whether charitable or political) or sponsorship request, the request should be denied and the incident should be reported to the HR. Please refer to the Whistleblowing Policy for detailed guidance.

Your Responsibilities

- A- You must ensure that you read, understand and comply with this Policy and the relevant standard operating procedures.
- B- You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- C- You must notify your Head or the HR as soon as possible if you genuinely believe or suspect that a breach of this Policy has occurred, or may occur in the future.
- D- It is a disciplinary offence for you to not comply with the terms of this Policy.