

# **ANTI-BRIBERY & CORRUPTION POLICY (ABC)**



## 1. Purpose Statement

FirstChoice POSM conducts business with integrity. We have zero tolerance for bribery and corruption in any form. No employee, director, agent, vendor, or partner may offer, give, solicit, or accept bribes. We comply with the Nigerian Corrupt Practices and Other Related Offences Act 2000, EFCC Act, and all applicable anti-corruption laws. Winning business honestly protects our reputation, our clients, and our people.

## 2. Scope

This Policy applies to:

- All FirstChoice POSM employees, directors, interns, and contract staff.
- All third parties acting for/on behalf of FirstChoice POSM: vendors, fabricators, agents, logistics partners, consultants.
- All jurisdictions we operate in. If local law sets a higher standard, that higher standard applies

## 3. What is Bribery & Corruption

- **Bribery:** Giving, offering, promising, requesting, or receiving anything of value to influence a business decision or gain improper advantage.
- **Corruption:** Abuse of entrusted power for private gain. Includes kickbacks, facilitation payments, extortion.
- **“Anything of value”** includes Cash, gifts, travel, entertainment, jobs for relatives, donations, discounts, favors, commissions not in contract.

## 4. Prohibited Conduct

Employees and partners must NOT:

- 4.1** Offer or pay bribes to clients, government officials, customs, venue owners, or suppliers to win jobs, speed permits, or overlook defects.
- 4.2** Accept bribes/kickbacks from vendors to select them, approve inflated invoices, or accept substandard POSM/merchandise.
- 4.3** Make facilitation payments — small payments to speed routine actions like customs release or venue access. If extorted under threat to life/safety, pay, remove yourself, and report immediately.
- 4.4** Offer gifts/entertainment to influence decisions. See Section 5 for permitted cases.
- 4.5** Use third parties to do what we cannot do directly. We are liable for agents/vendors who bribe on our behalf.
- 4.6** 4.6 Keep off-book accounts or falsify records to hide payments.

## **5. Gifts, Hospitality & Expenses**

5.1. Permitted if: Reasonable, proportionate, given openly, no expectation of return favour, and not during active tender/negotiation. Limit: Gifts ≤ ₦20,000 per person per year. Meals ≤ ₦15,000 per head. Log all gifts given/received > ₦5,000.

5.2. Prohibited always: Cash or cash equivalents (vouchers, crypto), gifts to government officials without MD approval, entertainment of a sexual nature, gifts during bid evaluation.

5.3. Approval: Any gift/hospitality > ₦20,000 or involving public officials needs MD/Compliance pre-approval via [compliance@firstchoiceposm.com](mailto:compliance@firstchoiceposm.com).

5.4. Receiving gifts: Decline politely if > ₦20,000 or if it feels inappropriate. If you cannot refuse without offending, accept, declare, and hand to HR for raffle/donation.

## **6. Procurement & Vendor Management**

6.1 Fair process: All vendors selected on price, quality, capacity, and ESG. 3 quotes for spends > ₦500,000 unless approved sole source.

6.2 Due diligence: New vendors complete the Responsible Partner Declaration. Red flags = refusal: no CAC, no TIN/VAT Certificate, owner is PEP with no justification, requests cash payments.

6.3 Contracts: All POs/contracts must include an anti-bribery clause and right to audit. No verbal awards.

6.4 Commissions: Only per written contract. No side deals, no “appreciation” payments to FirstChoice staff.

## **7. Government & Public Officials**

7.1 Extra caution applies. A “public official” includes customs, police, LASTMA, regulators, staff of state-owned venues/clients.

7.2 No gifts, hospitality, or payments except statutory fees with official receipts.

7.3 All interactions must be documented. Two FirstChoice staff present at meetings where possible.

## **8. Donations & Sponsorships**

Charitable donations/sponsorships must not be used to disguise bribes. All requests >N50,000 need MD approval + due diligence on recipient. No donations to secure business.

## **9. Books, Records & Reporting**

9.1 Accurate records: Every payment must be recorded with purpose, recipient, and receipt. No “miscellaneous” or “consultancy” to hide bribes.

9.2 Whistleblowing: Report concerns immediately, no retaliation.

Use: Email: [ino@firstchoiceposm.com](mailto:ino@firstchoiceposm.com)

Hotline: 08032001763

Direct: Your Line Manager, HR, or MD

9.3 Reports can be anonymous. We investigate all reports promptly and confidentially.

## **10. Consequences of Breach**

10.1 Employees: Disciplinary action up to dismissal, civil/criminal prosecution. FirstChoice will not pay fines for staff who breach.

10.2 Vendors/Partners: Contract termination, removal from vendor list, legal action, report to authorities.

10.3 Management: Senior managers held accountable for failing to prevent bribery by staff they supervise.

## **11. Training & Review**

11.1 All staff trained at onboarding and annually. Completion tracked by HR.

11.2 This Policy reviewed annually or after major incident/law change.

11.3 Questions? Contact [compliance@firstchoiceposm.com](mailto:compliance@firstchoiceposm.com).

## 12. Acknowledgement

I have read, understood, and will comply with the FirstChoice POSM Anti-Bribery & Corruption Policy.

Name: \_\_\_\_\_

Department & Company: \_\_\_\_\_

Signature & Date: \_\_\_\_\_