

## Policy

## BPA Policy on Business Conduct

All employees are expected to maintain the highest standards of ethical conduct in carrying out the business of the Company. The Company's policy in respect of the conduct of its business is summarised in BPA's "Statement of Business Principles".

### STATEMENT OF BUSINESS PRINCIPLES

In fulfilling its mission to conduct a growing, profitable business across a wide range of pipeline transportation and storage activities in the UK and overseas, BPA conducts its affairs in accordance with a series of business principles which provide the framework of policies and standards within which the company carries out its duties and responsibilities:

#### 1. RESPONSIBILITIES

BPA recognizes its responsibility to:-

- 1.1. **Add value for its Customers** by understanding and responding quickly to customers' needs, and providing professional and cost effective services, and continuing to build a reputation for faultless performance.
- 1.2. **Provide reward to its Shareholders** by generating profit and cash while protecting shareholders' investment and providing an acceptable return.
- 1.3. **Provide reward to its Staff** by ensuring good and safe conditions of work and competitive terms and conditions of service; by offering staff a fulfilling career through the development and best use of their skills and by offering equal opportunity employment.
- 1.4. **Pay due regard to the Community** by conducting business as efficiently as possible as a responsible corporate member of society; by complying with applicable laws and regulations of the countries in which it operates or has contractual association, and by performing with proper regard to health, safety and environmental standards. The company shall seek to uphold its reputation and that of its shareholders in the application of these standards.
- 1.5. **To seek mutually beneficial relationships with Contractors and Suppliers** and to promote the application of BPA's policy on business conduct. This will be an important factor in the decision to enter into or remain in such relationships.

#### 2. BUSINESS INTEGRITY

##### 2.1. Proper Control and Accounting

BPA undertakes to maintain an adequate system of internal financial controls and segregation of duties in compliance with good accounting practice, to ensure that at all times the accounts accurately reflect, properly describe and promptly record the transactions undertaken, and are subject to regular audit.

BPA's financial accounting policies shall generally operate in accordance with the accounting policies of its shareholders in order to comply with its shareholders corporate governance requirements.

##### 2.2. Business Conduct

BPA requires that business activities are conducted with honesty, integrity and fairness and expects the same in its relationships with contractors and suppliers. BPA is committed to ensure best value in the procurement of goods and services for its customers and to ensuring equitable treatment of contractors and suppliers in its tendering processes.

BPA is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. As part of its Procurement Procedures BPA carries out counter party due diligence checks on defined contractors and suppliers' which includes checks for compliance with Anti-Bribery and Corruption, Anti-Money Laundering and International Trade Sanction Regulations.

### **2.3. Anti Slavery and Human Trafficking**

BPA have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

BPA are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

### **2.4. Personal Conduct & Prevention of Bribery**

All staff are required to avoid conflicts of interest between their private affairs (including family members) and their conduct of company business. The offer, payment, soliciting and acceptance of bribes or inducements in any form, by employees, by organisations and by individuals providing services on our behalf are unacceptable practices. In addition, corruption in any form is unacceptable. Staff must not provide or accept gifts or hospitality without the prior agreement of line management. Such gifts or hospitality must not be of material value, nor of a nature that public disclosure would cause embarrassment to BPA or its shareholders.

BPA follow a risk based due diligence procedure for assessing associated persons (as defined in Bribery legislation) through the bidding process.

BPA's Code of Conduct and Disciplinary Procedure can be found in section A9 of the Personnel Manual. Policy guidelines on gifts and hospitality can be found in section A14 of the Personnel Manual.

### **2.5. Use of Company Information and Resources**

BPA requires that all staff handle sensitive information discreetly and protect assets and information from improper access or use by others. The unauthorised disclosure of company / clients information or misuse of company / clients assets is treated as a disciplinary offence.

BPA conducts its business within Competition Law and Confidentiality guidelines and due consideration is given to any specific Confidentiality Agreements. In addition BPA adheres to money laundering and international trade regulations.

## **3. HEALTH, SAFETY AND ENVIRONMENT**

BPA's policy is to conduct its business to take full account of the health and safety of its staff and of other parties who may be affected by its operations, and to safeguard the environment and minimise the environmental impact of its activities. The company establishes appropriate management systems and practices, sets targets for continuous improvement and measures, appraises and reports on its performance.

## **4. PEOPLE**

Our responsibility is to create an inclusive work environment where every employee has an equal opportunity to develop his or her skills and talents. BPA employees are entitled to work in an environment in which people are treated with respect. This is in accordance with section A2 and A3 of the HRI Manual.

## 5. COMMUNICATION

BPA regards openness of communications as essential in its business dealings, and will provide full and relevant information to legitimate interested parties about its activities, subject to the appropriate observance of commercial confidentiality of its client contracts.

A handwritten signature in black ink, appearing to read 'P M Davis', with a stylized flourish at the end.

P M Davis  
Director and General Manager, BPA  
For and on behalf of the BPA Board  
03 July 2020