



## Anti-Bribery (Fraud) and Investigation Policy

<b>Name of the Document</b>	<b>Anti-Bribery (Fraud) and Investigation Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Introduction

- 1.1.** An Anti-Bribery (Fraud) and Investigation Policy for BEZA outlines what Bribery and Fraud is, as well as the procedures for preventing, detecting, and investigating fraudulent activities. Bribe is a type of fraud which is rampant in the engineering consulting services. Therefore, this policy establishes a platform to promote and maintain the integrity of the BEZA staff by declaring the policy statement of the board on Anti-Bribery (Fraud).

## 2. Related Legislative Framework for references

- This policy statement complies with the Ethiopia, Tanzania, Uganda, Kenya, Swaziland, Rwanda and Somaliland Domestic anti-bribery laws and the Ethiopia Domestic laws. The following Acts of Parliament are related to Anti-bribery efforts enunciated in this document.

### **2.1. Ethiopia Domestic anti-bribery laws:**

- i. Corruption Crimes Proclamation No. 881/2015,
- ii. Revised Anti-Corruption Special Procedure and Rules of Evidence Proclamation No. 882/2015
- iii. The Revised Federal Ethics and Anti-Corruption Commission Establishment Proclamation No. 433/2005 and
- iv. the Proclamation to Amend the Revised Federal Ethics and Anti-Corruption Commission Establishment Proclamation No. 8883/2015

### **2.2. Foreign anti-bribery laws:**

- The US Foreign Corrupt Practices Act of 1977, as amended, 15 U.S.C. §§ 78dd-1, et seq. (FCPA)

### **2.3. Tanzania Domestic anti-bribery laws:**

- Prevention and Combating of Corruption Act, 2007, (PCCA)
- Anti Money Laundering Act, 2006,
- The Economic and Organized Crimes Control Act, [Cap 200 R.E 2002],
- Criminal Procedure Act, [Cap 20 R.E 2002],
- The Public Procurement Act, 2011,
- The Public Finance Act, 2004,

### **2.4. Uganda Domestic anti-bribery laws:**

- Anti-Corruption Act 20095 (Amended 2015)

### **2.5. Kenya Domestic anti-bribery laws:**

- Bribery Act, No. 47 of 2016
- Bribery Regulations, 2020

### **2.6. Swaziland Domestic anti-bribery laws:**

- Prevention of Corruption Act, 2006 (Act No. 3 of 2006)



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- 2.7. **Rwanda Domestic anti-bribery laws:**

- Anti-Corruption Act (2018)
- National Anti-Corruption Policy (2012)

- 2.8. **Somaliland Domestic anti-bribery laws:**

- Somaliland Penal Code (1963, adapted from Italian Penal Code)
- Somaliland Anti-Corruption and Good Governance Commission Act (Law No. 54/2012)
- Public Financial Management Act (PFM Act)

### 3. Purpose and Scope

3.1. **Purpose:** To establish an anti-bribery (fraud) and investigation policy that promotes a culture of honesty, integrity, and transparency in the operations of BEZA as a consulting civil engineering company.

3.2. **Scope:** Applies to all BEZA employees, its contractors, and stakeholders.

### 4. Anti-Bribery (Fraud) Principles

4.1. **Prevention:** Implement measures to prevent fraudulent activities, such as internal controls, audits, code of conduct, ethical policies and training.

4.2. **Detection:** Establish procedures for detecting fraudulent activities, such as monitoring, reporting, and investigating.

4.3. **Investigation:** Conduct thorough investigations into alleged fraudulent activities, with transparency and accountability.

### 5. Policy Statement on Bribe and Fraud

5.1. **What constitutes a bribe?**

5.1.1. For anyone, with intention to procure a public servant or employee of a public organization (including a conciliator, arbitrator, juror, trustee or liquidator, translator or interpreter) to perform or omit an act in violation of the duty proper to their office and giving or offering an advantage or gift to such public servant or employee of a public organization.

5.1.2. For anyone, giving or offering an advantage or gift to any official or employee of a foreign state or international organization, with the intent to procure them to perform or omit an act related to international trade or transaction in violation of their official duties.

5.1.3. For anyone, in consideration for the performance by a public servant or employee of a public organization of an act proper to their office, giving or offering them an advantage or a gift before or after the performance of such an act.



- 5.1.4. For any public servant or employee of a public organization directly or indirectly, seeking, receiving or exacting a promise of an advantage for themselves or another, in order to act or refrain from acting, in violation of the duties proper to their office.
- 5.1.5. For anyone, even without receiving any consideration for themselves, accepting money, a valuable thing, a service or some other benefit from another with a view to giving it as a bribe to a public servant or employee of a public organization or using their bank account for such transaction or creating condition or mediating or offering meeting places for such bribery.
- 5.2. Management's Policy Position on Bribe and Fraud?**
  - 5.2.1. All facilitation payments (i.e. small payments to speed up routine governmental action) ARE considered bribes and BEZA prohibits facilitation payments by any member or employee of BEZA.
  - 5.2.2. Political contributions in any form, are prohibited
  - 5.2.3. The Board has **zero tolerance to Bribery** and all other forms of Fraud as defined in section 6 below
- 5.3. AFDB Group and other Multi-lateral Banks Sanctionable Practices** which BEZA has **Zero tolerance of are:** (as defined in Section 18: Appendix below)
  - 5.3.1. Corrupt practices
  - 5.3.2. Fraudulent practices
  - 5.3.3. Collusive practices
  - 5.3.4. Coercive practices
  - 5.3.5. Obstructive practices

## 6. Fraudulent Activities Defined

- 6.1. **Theft:** Misappropriation of company assets, including money, property, and data.
- 6.2. **Bribery:** Offering, giving, or receiving bribes to influence business decisions.
- 6.3. **Corruption:** Engaging in corrupt practices, including embezzlement, extortion, and abuse of power.
- 6.4. **False Accounting:** Manipulating financial records, including invoices, expenses, and accounting entries.
- 6.5. **Fraud:** is the intentional deception or misrepresentation of information with the goal of obtaining an unfair or unlawful advantage
  - 6.5.1. **Fraud extends to include other international common practices:** corrupt, fraudulent, collusive, coercive, or obstructive practices related to an Activity that require investigation, audit, or sanctions.

## 7. Forms of Fraud

- 7.1. **Financial fraud:** Misusing funds, assets, or financial information for personal gain.



- 7.2. **Identity fraud:** Stealing or misusing someone's personal information, such as their name, social security number, or credit card details.
- 7.3. **Asset misappropriation:** Stealing or misusing an organization's assets, such as inventory, equipment, or intellectual property.
- 7.4. **Corruption:** Offering, giving, receiving, or soliciting something of value to influence an official decision or action. (Popular in Tendering and Procurement)
- 7.5. **Cyber fraud:** Using technology to commit fraud, such as hacking, phishing, or online scams.

## 8. Types of fraud:

- 8.1. **Internal fraud:** Committed by employees or insiders within an organization.
- 8.2. **External fraud:** Committed by outsiders, such as customers, vendors, or hackers.
- 8.3. **Management fraud:** Committed by senior management or executives within an organization.

## 9. Red flags of fraud which should trigger investigation:

- 9.1. **Unusual transactions:** Large or unusual transactions that don't align with normal business activities.
- 9.2. **Inconsistencies:** Discrepancies in financial records, inventory, or other assets.
- 9.3. **Unexplained changes:** Unexplained changes in behavior, such as sudden increases in spending or lavish gifts.
- 9.4. **Lack of transparency:** Difficulty obtaining information or a lack of transparency in business dealings.

## 10. Reporting Suspicious Activities

- 10.1. **Reporting Mechanism:** BEZA has established a Fraud Whistleblowing reporting mechanism, in the form of a hotline and an email address, for reporting suspicious activities. The Hotline and emails are given below as:
  - 10.1.1. **Telephone Hotline:** +251-0114-705130
  - 10.1.2. **Email Hotline:** [Whistle@bezaconsultinc.com](mailto:Whistle@bezaconsultinc.com)
- 10.2. **Confidentiality:** Management will ensure confidentiality in reporting and protect whistleblowers. The reporting system (email) is codified to eliminate trace/ identity of the reporting person. The calls are encrypted hotlines. BEZA operates an Anonymous physical drop box.
- 10.3. **Investigation:** Investigate all reports of suspicious activities, with transparency and accountability.



## 11. Investigation Procedures

- 11.1. **Initial Response:** Respond promptly to reports of suspicious activities, with an initial assessment and investigation plan.
- 11.2. **Investigation Team:** Assemble an investigation team, including internal auditors, lawyers, and other experts.
- 11.3. **Evidence Collection:** Collect and preserve evidence, including documents, emails, and witness statements.
- 11.4. **Interviews:** Conduct interviews with witnesses, suspects, and other relevant parties.

## 12. Disciplinary Actions

- 12.1. **Disciplinary Procedures:** Follow established disciplinary procedures, including suspension, termination, and reporting to authorities.
- 12.2. **Accountability:** Hold employees and management accountable for fraudulent activities, with consequences for failure to report or investigate.

## 13. Prevention and Training

- 13.1. **Internal Controls:** Implement internal controls, including audits, monitoring, and reporting.
- 13.2. **Training:** Provide regular training on anti-fraud policies, procedures, and best practices.
- 13.3. **Awareness:** Promote awareness of fraudulent activities and the importance of reporting suspicious activities.
- 13.4. **Monitoring and surveillance:** Regularly monitor and surveil business activities to detect unusual patterns.
- 13.5. **Whistleblower policies:** Establish whistleblower policies to encourage employees to report suspicious activity.

## 14. Accountability and Oversight

- 14.1. **Accountability:** Management and employees are held accountable for implementing and enforcing the Anti-Fraud and Investigation Policy.
- 14.2. **Oversight:** Management has established oversight mechanisms, including internal and external audits and reviews, to ensure compliance with the policy.

## 15. Responsibilities

- 15.1. The Anti-Bribery (Fraud) Management Committee (3 members) has been assigned the responsibility of implementing and enforcing the Anti-Fraud policy.



- 15.2. The Chairperson of this committee should initiate the investigation if there is predicate offence.
- 15.3. The investigator appointed by the Committee should carry out the investigation and provide an investigation report to the committee. The investigator should make recommendations to the committee of the course of action to be taken by the committee against the accused.
- 15.4. The accused should be cooperative with the investigation process by not concealing information and providing honest and relevant evidence. and respond to fraud allegations.
- 15.5. Every employee should abide by the principles and policy statement of this policy.

## 16. Review and Revision

- 16.1. Regular Review: Management reviews the Anti-Fraud and Investigation Policy regularly (annually) to ensure it remains effective and relevant.
- 16.2. Revision: Management should revise the policy as necessary to reflect changes in laws, regulations, or company policies.

## 17. Standard Operating Procedures

- 17.1. BEZA Management has developed Anti-Bribery (Fraud) Standard Operating Procedures to carry out the requirements of this Policy.

## 18. Appendix

### Definition of Additional Terms

- 1.1. **Corrupt practices:** The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party.
- 1.2. **Fraudulent practices:** Any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- 1.3. **Collusive practices:** An arrangement between two or more parties designed to achieve an improper purpose, including to improperly influence the actions of another party.
- 1.4. **Coercive practices:** Impairing or harming or threatening to directly or indirectly impair or harm any party or the property of the party, to improperly influence the actions of a party.
- 1.5. **Obstructive practices:**
  - 1.5.1. Destroying, falsifying, altering all concealing of evidence material to a bank investigation, or making false statements to investigators, with the intent to impede a bank group investigation.

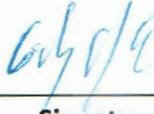


- 1.5.2. Threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to a bank group investigation or from pursuing investigation or,
- 1.5.3. acts intended to impede the exercise of the AfBD Group's contractual rights of audits or inspection or access to information.





## BCE Tendering Policy and Procedures

Name of the Document	Tendering Policy and Procedures	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



## 1. Purpose and Scope

- 1.1. The purpose of this policy is to outline the guidelines and procedures for preparing and submitting tenders for civil engineering and other projects.
- 1.2. This policy applies to all employees, sub-consultants, partners, and stakeholders involved in the tendering process.

## 2. Policy Statement

- 2.1. BEZA is committed to participating in tendering processes in a **fair, transparent, and professional manner**.
- 2.2. BEZA ensures that all tenders are prepared and submitted in accordance with the requirements of the client and relevant laws and regulations.

## 3. Key Components

### 3.1. *Pre-Tendering*

- 3.1.1. **Tender opportunity identification:** Identify tender opportunities that align with the company's strategic objectives and capabilities.
- 3.1.2. **Tender evaluation:** Evaluate the tender requirements and assess the company's ability to meet those requirements.
- 3.1.3. **Tender clarification:** Seek clarification on issues that are not clear in the Tender opportunity identified

### 3.2. *Tender Preparation*

- 3.2.1. **Tender team formation:** BEZA has established a tender team to prepare and submit the tender. This team has 3 senior and technical members of staff.
- 3.2.2. **Tender strategy development:** There is a tender strategy that outlines the approach, methodology, and key messages as outlined in the Business Plan and Business Development plan.
- 3.2.3. **Methodology and approach:** ensure the availability of the required staff. Ensure accuracy of the CV of professionals' staff for the project.
- 3.2.4. **Tender Partnering:** Should BEZA seek to complement its skills resources with an external partner, the technical team should do a due diligence on the potential partners to see if they are not sanctioned and have a clear and traceable trade record. In particular, the Tender Manager and his/her team should ensure that potential partners are screened for political exposure, adverse media that may lead to reputation damage, criminal and litigation, regulatory inquiries and others
- 3.2.5. **Tender preparation schedule:** Identifying a list of tasks to be performed, assigned person to do it and deadline for completion of each task.
- 3.2.6. **Tender document preparation:** BEZA should prepare the tender document, including all required information, such as company profile, key people's CVs, project experience, and



pricing in an ethical manner. The Tender document pack so prepared should be true, correct and accurate. Employees in the tender preparation stage should ensure that no misrepresentation of the required information is presented. An omission or misrepresentation of this crucial task is treated as an employee misconduct,

### **3.3. Tender Submission**

3.3.1. **Tender submission:** Submit the tender document in accordance with the client's requirements and deadlines. No BEZA employee should short-circuit the tender submission procedures

3.3.2. **Tender-Box Opening:** A BEZA employee should be present on the tender opening time and date.

The BEZA employee in presence should ensure that the following is observed:

3.3.2.1. **Before Tender Opening:** ensure that the Tender Box is secured, do not accept late submissions under any circumstances, ensure there is a register/logbook to record all submitted tenders (date, time, bidder name, representative)

3.3.2.2. **During Tender Box (Box) Opening:** Ensure the Box is opened at Specified Time and Place as in advertised

3.3.2.3. Opening of the Box is done by the Tender Opening Committee of at least 2–3 officials

3.3.2.4. Read Aloud & Record Key Details (Bidder name, Bid price, Tender submission format (e.g., presence of required documents), Sign Tender Opening Minutes)

3.3.2.5. Do **not allow** any correction or addition to bids at the opening stage

3.3.3. **Tender follow-up:** Follow up with the client to confirm receipt of the tender and to address any questions or concerns.

### **3.4. Post-Tendering**

3.4.1. **Tender evaluation:** Evaluate the outcome of the tender and identify areas for improvement. This should be done by the Tender formation team.

3.4.2. **Debriefing:** Conduct a debriefing session with the tender team to discuss the outcome and identify lessons learned.

## **4. Procedures**

4.1. **Tender checklist:** Use a tender checklist to ensure that all required information is included in the tender document. See Appendix on Section 7 below for a Tender Checklist.

4.2. **Tender review and approval:** Review and approve the tender document before submission. The following BEZA employees should be involved in the review and approval of the tender documentation:

4.2.1. Tender Manager

4.2.2. Managing Director

4.3. **Tender submission tracking:** Track the tender submission to ensure that it is received by the client on time.



## 5. Responsibility and Accountability

- 5.1. **Tender manager:** The tender manager is responsible for leading the tender team and ensuring that the tender is prepared and submitted in accordance with this policy.
- 5.2. **Tender team members:** Tender team members are responsible for contributing to the preparation and submission of the tender. They are responsible to check and confirm the consistency of CV and relevant testimonies. Check that all required information is fulfilled, and that the lessons learnt from unsuccessful tenders are implemented
- 5.3. **The Managing Director** is responsible for reviewing and approving the tender document before submission.
- 5.4. The BEZA management should be held accountable to this process.

## 6. Monitoring and Review

- 6.1. **Regular review:** This policy will be reviewed regularly to ensure it remains effective and compliant with the industry's best practices and regulatory requirements.
- 6.2. **Continuous improvement:** Opportunities for continuous improvement will be identified and implemented, as necessary, to ensure ongoing tender excellence.

## 7. Appendices

### Tender Submission Checklist – BEZA Civil Engineering Consulting Company

#### 1. Pre-Tender Requirements

- Identify and review tender opportunity from relevant source
- Confirm eligibility criteria (e.g., company registration, local content, etc.)
- Conduct Go/No-Go assessment (feasibility, capacity, strategic fit)
- Register interest (if required)
- Clarify scope and deadlines with tendering authority

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#### 2. Administrative & Legal Documents

- Company profile (updated and relevant to the tender)
- Valid trade license
- Certificate of incorporation
- VAT registration certificate and TIN
- Tax clearance certificate (most recent)
- Business registration with regulatory authorities (e.g., ERB or other)
- Power of Attorney for authorized signatory
- Joint Venture/Consortium agreement (if applicable)
- Insurance certificates (professional indemnity, workers' comp, etc.)

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#### 3. Technical Proposal Documents



- Executive summary / Technical proposal cover letter
- Approach and methodology tailored to scope
- Work plan and Gantt chart
- Organizational chart and team structure
- CVs of proposed personnel (signed and relevant)
- Past performance & experience (relevant case studies)
- Equipment and resources availability (if required)
- Quality assurance & control procedures
- Health, Safety and Environmental (HSE) policy
- Risk management plan

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#### 4. Financial Proposal Documents

- Detailed cost breakdown
- Summary of fees and lump sum (if applicable)
- Payment terms
- Taxes clearly indicated or stated as inclusive/exclusive
- Pricing consistent with scope and local market
- Financial proposal submitted in separate envelope (if required)

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#### 5. Compliance & Forms

- Completed bid forms (BoQ, Schedules, Forms of Tender, etc.)
- Bid security/bond (if required, in correct format and amount)
- Declaration of non-collusion/non-conflict of interest
- Declaration of litigation (if required)
- Confirmation of site visit (if required)
- Compliance checklist completed and signed

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#### 6. Packaging & Submission

- All documents signed and stamped
- Correct number of hard/soft copies prepared
- Correct envelope labeling (Technical/Financial – as required)
- Sealed according to instructions
- Submission before deadline (time-stamped proof of delivery)
- A soft backup copy archived internally

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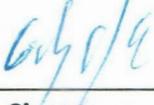
#### 7. Post-Submission

- Acknowledgment of receipt by tendering authority
- Record in tender tracking log
- Prepare for possible clarifications or presentations
- Debrief and lessons learned session (if not awarded)





## Board of Directors' Commitment to BEZA's Ethical values

Name of the Document	Board of Directors' Commitment to BEZA's Ethical values	
<p>Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam</p>	 <hr/> Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

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## 1. Introduction

- 1.1. The Board of Directors of BEZA is committed to upholding the highest standards of corporate ethics and integrity. As BEZA, we recognize that our actions and decisions have a significant impact on our stakeholders, including employees, clients, suppliers, and the wider community.

## 2. Corporate Ethical Values

The Board of Directors is committed to the following corporate ethical values:

- 2.1. **Integrity:** We conduct our business with honesty, transparency, and integrity.
- 2.2. **Respect:** We treat all stakeholders with respect, dignity, and fairness.
- 2.3. **Responsibility:** We take responsibility for our actions and decisions and be accountable for their consequences.
- 2.4. **Fairness:** We conduct our business in a fair and equitable manner, without bias or discrimination.
- 2.5. **Compliance:** We comply with all relevant laws, regulations, and industry standards.

## 3. Commitment to Ethical Conduct

The Board of Directors is committed to:

- 3.1. **Establishing a culture of ethics:** We promote a culture of ethics and integrity and zero tolerance of corruption throughout the organization.
- 3.2. **Providing training and resources:** We ensure the provision of training and resources to employees to ensure they understand and comply with our corporate ethical values.
- 3.3. **Encouraging reporting of unethical conduct:** We encourage employees to report any unethical conduct or concerns and ensure that they are protected from retaliation.
- 3.4. **Investigating and addressing unethical conduct:** We investigate all reports of unethical conduct and take prompt and appropriate action to address any wrongdoing.
- 3.5. **Reviewing and updating our corporate ethical values:** We regularly review and update our corporate ethical values to ensure they remain relevant and effective.

## 4. Accountability

The Board of Directors is accountable for:

- 4.1. **Ensuring compliance with corporate ethical values:** We ensure that the organization complies with our corporate ethical values.
- 4.2. **Non-Compliances:** We ensure that the organization resolves non-compliance issues as soon as possible



- 4.3. **Providing oversight and guidance:** We provide oversight and guidance to management and employees to ensure they understand and comply with our corporate ethical values.
- 4.4. **Addressing unethical conduct:** We address any unethical conduct or concerns and take prompt and appropriate action to prevent future occurrences.
- 4.5. **Implementation of Compliance Programme:** We have overall responsibility for implementing and continuous improvement of the organization's compliance programme.

## 5. Conclusion

- 5.1. BEZA Board of Directors is committed to upholding the highest standards of corporate ethics and integrity.
- 5.2. We recognize that our actions and decisions have a significant impact on our stakeholders, and we are dedicated to ensuring that our organization operates with integrity, respect, responsibility, fairness, and compliance.





## Business Development (BD) policy

<b>Name of the Document</b>	<b>Business Development (BD) policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 <hr/> <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

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## 1. Purpose and Scope

- 1.1. **Purpose:** To establish a framework for business development activities that align with the company's strategic objectives.
- 1.2. **Scope:** Applies to all employees involved in business development, marketing, and sales activities.

## 2. Business Development Objectives

- 2.1. **Revenue Growth:** Increase revenue by [20] % annually.
- 2.2. **Market Expansion:** Expand services into [3] new markets/geographies.
- 2.3. **Service Diversification:** Develop and offer [2] new services.

## 3. Policy Statement

In pursuit of our business development objectives outlined in section 2 above, BEZA employees should observe the following, that:

- 3.1. BEZA's company values, including integrity, will not be compromised in the pursuit of revenue.
- 3.2. When a BEZA employee is faced with a moral dilemma of disregarding integrity while pursuing business development, ethical conduct should prevail and therefore there is no room to compromise integrity.

## 4. Business Development Strategies

- 4.1. **Networking:** Attend industry events, conferences, and trade shows.
- 4.2. **Relationship Building:** Foster strong relationships with existing clients, partners, and stakeholders.
- 4.3. **Marketing:** Leverage digital marketing, social media, and content marketing.
- 4.4. **Proposal Development:** Develop high-quality proposals in response to RFPs/RFQs.
- 4.5. **Partnerships and Collaborations:** Pursue strategic partnerships and collaborations.

## 5. Business Development Process

- 5.1. **Opportunity Identification:** Identify potential business opportunities through market research, networking, and client feedback.
- 5.2. **Opportunity Qualification:** Evaluate opportunities based on criteria such as alignment with company strategic objectives, competition, and potential revenue.
- 5.3. **Proposal Development:** Develop proposals in response to qualified opportunities.
- 5.4. **Presentation and Negotiation:** Present proposals and negotiate contracts.



- 5.5. **Contract Award and Project Execution:** Execute projects and deliver services.

## 6. Business Development Metrics and Monitoring

- 6.1. **Key Performance Indicators (KPIs):** Track KPIs such as revenue growth, proposal win rate, and client satisfaction.
- 6.2. **Business Development Pipeline:** Monitor the business development pipeline to ensure a steady flow of opportunities.
- 6.3. **Regular Progress Reports:** Provide regular progress reports to senior management and stakeholders.

## 7. Roles and Responsibilities

- 7.1. **Business Development Team:** Responsible for identifying opportunities, developing proposals, and presenting them to clients.
- 7.2. **Senior Management:** Provides strategic direction, reviews progress and allocates resources.
- 7.3. **Technical Staff:** Provides technical expertise and support for proposal development and project execution.

## 8. Training and Development

- 8.1. **Business Development Training:** Provide training on business development skills, such as proposal writing, presentation, and negotiation.
- 8.2. **Industry Knowledge:** Encourage staff to stay up-to-date with industry trends, best practices, and regulatory requirements.

## 9. Review and Revision

- 9.1. **Regular Review:** Review of the business development policy annually or as needed.
- 9.2. **Revision:** Revise the policy to reflect changes in the company's strategic objectives, market conditions, or industry trends.





## Compliance and Monitoring Policy

<b>Name of the Document</b>	<b>Compliance and Monitoring Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

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## 1. Purpose and Scope

- 1.1. **Purpose:** BEZA is committed to maintaining the highest standards of ethics, integrity, and compliance with applicable laws, regulations, and industry standards. This policy aims to ensure that the BEZA and its employees comply with all relevant requirements and maintain a culture of transparency and accountability.
- 1.2. **Scope:** This policy applies to all BEZA employees, officers, directors, sub-consultants, business partners and third-party service providers.

## 2. Compliance and Monitoring Objectives

### 2.1. Primary Objectives

- 2.1.1. *Ensure Compliance with Laws and Regulations:* Ensure that BEZA complies with all applicable laws, regulations, and industry standards.
- 2.1.2. *Maintain a Culture of Transparency and Accountability:* Foster a culture of transparency and accountability within BEZA, encouraging employees to report any suspected violations of this policy.
- 2.1.3. *Identify and Mitigate Risks:* Identify and mitigate risks associated with non-compliance and ensure that BEZA takes proactive steps to prevent non-compliance.

### 2.2. Secondary Objectives

- 2.2.1. *Provide Training and Awareness Programs:* Provide regular training and awareness programs for employees on compliance requirements and the importance of maintaining a culture of compliance.
- 2.2.2. *Establish Clear Reporting and Escalation Procedures:* Establish clear reporting and escalation procedures for suspected violations of this policy and ensure that all reports are thoroughly investigated and addressed.
- 2.2.3. *Continuously Monitor and Review Compliance:* Continuously monitor and review compliance with this policy and identify areas for improvement.
- 2.2.4. *Ensure Accountability:* Hold employees, officers, and directors accountable for complying with this policy and reporting any suspected violations.

### 2.3. Performance Metrics

- 2.3.1. *Compliance Rate:* Measure the BEZA's compliance rate with applicable laws, regulations, and industry standards.
- 2.3.2. *Training Participation Rate:* Measure the participation rate of employees in training and awareness programs.
- 2.3.3. *Reporting and Escalation Rate:* Measure the number of reports received and escalated through the reporting and escalation procedures.



- 2.3.4. *Audit and Review Findings*: Measure the findings of audits and reviews conducted to ensure compliance with this policy.

### 3. Policy Statement

BEZA is committed to:

- 3.1. *Complying with applicable laws and regulations*: We will comply with all applicable laws, regulations, and industry standards.
- 3.2. *Maintaining a culture of transparency and accountability*: We will maintain a culture of transparency and accountability and encourage employees to report any suspected violations of this policy.
- 3.3. *Providing training and awareness programs*: We will provide regular training and awareness programs for employees on compliance requirements and the importance of maintaining a culture of compliance.
- 3.4. *Conducting regular audits and reviews*: We will conduct regular audits and reviews to ensure compliance with applicable laws, regulations, and industry standards.
- 3.5. *Enforcing disciplinary action for non-compliance*: We will enforce disciplinary action, up to and including termination, for employees who fail to comply with this policy.
- 3.6. *Comply with international best practices*: Not committing any sanctionable practices
- 3.7. *Responsibility*: The [Compliance Officer/Designated Officer] is responsible for overseeing compliance with this policy and reporting any violations or concerns to management.

### 4. Compliance and Monitoring Policy Principles

- 4.1. *Principle 1: Commitment to Compliance*: We are committed to complying with all applicable laws, regulations, and industry standards.
- 4.2. *Principle 2: Culture of Transparency and Accountability*: We will maintain a culture of transparency and accountability and encourage employees to report any suspected violations of this policy.
- 4.3. *Principle 3: Risk-Based Approach*: We will adopt a risk-based approach to compliance, focusing on areas of high risk and potential impact.
- 4.4. *Principle 4: Training and Awareness*: We will provide regular training and awareness programs for employees on compliance requirements and the importance of maintaining a culture of compliance.
- 4.5. *Principle 5: Continuous Monitoring and Review*: We will continuously monitor and review our compliance and monitoring program to ensure its effectiveness and identify areas for improvement.



- 4.6. *Principle 6: Disciplinary Action for Non-Compliance:* We will enforce disciplinary action, up to and including termination, for employees who fail to comply with this policy.
- 4.7. *Principle 7: Reporting and Escalation:* We will establish clear reporting and escalation procedures for suspected violations of this policy and ensure that all reports are thoroughly investigated and addressed.
- 4.8. *Principle 8: Confidentiality and Anonymity:* We will maintain confidentiality and anonymity for employees who report suspected violations of this policy and protect them from retaliation.
- 4.9. *Principle 9: Continuous Improvement:* We will continuously review and update our compliance and monitoring program to ensure it remains effective and aligned with changing regulatory requirements and industry standards.
- 4.10. *Principle 10: Accountability:* We will hold employees, officers, and directors accountable for complying with this policy and reporting any suspected violations.

## 5. Compliance Requirements

- 5.1. BEZA will comply with all applicable laws, regulations, and industry standards, including:
  - 5.1.1. **Professional engineering licensing requirements:** Ensure that all professional engineers are properly licensed and registered.
  - 5.1.2. **Building codes and regulations:** Comply with all applicable building codes, zoning regulations, and environmental regulations.
  - 5.1.3. **Health and safety regulations:** Ensure a safe working environment and comply with all applicable health and safety regulations.
  - 5.1.4. **Anti-corruption and bribery laws:** Prohibit bribery, corruption, and other unethical practices.
  - 5.1.5. **Best International practices in Integrity Compliance Program, i.e. not participating in Sanctionable Practices,** which includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice.
  - 5.1.6. **Data protection and privacy laws:** Protect client data and comply with all applicable data protection and privacy laws.

## 6. Monitoring and Reporting

- 6.1. **Compliance Officer:** Appoint a Compliance Officer to oversee compliance with this policy and report any violations or concerns to management.
- 6.2. **Regular audits and reviews:** Conduct regular audits and reviews to ensure compliance with applicable laws, regulations, and industry standards.





## 11. Compliance Incidents Handling

- 11.1. **Incident Reporting:** Establish a system for reporting compliance incidents. Refer to Standard Operating Procedures for ways to report incidents.
- 11.2. **Incident Investigation:** Investigate all compliance incidents.
- 11.3. **Corrective Action:** Take corrective action to prevent future incidents.

## 12. Compliance Governance

- 12.1. **Compliance Committee:** Establish a Compliance Committee to oversee compliance efforts. The compliance committee should consist of The Board Chairman, the Managing Director, Head of Finance, Head of Human Resources and the compliance officer being the secretary of the compliance committee.
- 12.2. **Board of Directors:** Ensure the Board of Directors is informed of compliance efforts and incidents.

## 13. Compliance Communication

- 13.1. **Compliance Communication:** Communicate compliance policies and procedures to all employees, contractors, and stakeholders.
- 13.2. **Compliance Awareness:** Promote compliance awareness throughout the BEZA.

## 14. Compliance Records

- 14.1. **Compliance Records:** Maintain accurate and complete compliance records.
- 14.2. **Record Retention:** Establish a record retention policy for compliance records.

## 15. Compliance Review and Revision

- 15.1. **Regular Review:** Review the Compliance and Monitoring Policy regularly.
- 15.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or BEZA objectives.





## Donations and Sponsorship Policy

<b>Name of the Document</b>	<b>Donations and Sponsorship Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** BEZA is committed to giving back to the community and supporting worthy causes. This policy aims to ensure that our donations and sponsorships are made in a responsible and transparent manner.
- 1.2. **Scope:** This policy applies to all BEZA employees, officers, and directors.

## 2. Definitions

- 2.1. **Donation:** A gift of money, goods, or services to a charitable organization or cause.
- 2.2. **Sponsorship:** A contribution of money, goods, or services to support an event, organization, or individual.

## 3. Policy Statement

- 3.1. BEZA will make donations and sponsorships that align with our company values and support the communities where we operate.
- 3.2. **Policy Guidelines**
  - 3.2.1. **Charitable Donations:** Donations will be made to only registered charitable organizations or causes that align with our company values.
  - 3.2.2. **Sponsorships:** Sponsorships will be made to support events, organizations, or individuals that promote education, innovation, or community development.
    - 3.2.2.1. No sponsorship should be given to a political organisation/ party with an express or implied intent to solicit for business favours or any other advantages
  - 3.2.3. **Transparency:** All donations and sponsorships will be transparent and publicly disclosed.
  - 3.2.4. **No Quid Pro Quo:** Donations and sponsorships will not be made in exchange for business favors or advantages.
  - 3.2.5. **Compliance with Laws:** Donations and sponsorships will comply with all applicable laws and regulations.

## 4. Approval Process

- 4.1. **Request for Donation or Sponsorship:** Employees or external organizations can submit requests for donations or sponsorships. However, these donations and sponsorships should not be political.



- 4.2. **Review and Approval:** Requests will be reviewed and approved by the designated approval authority. This approval authority is the Managing Director, and the Chairman of the Board combined.
- 4.3. **Documentation:** All donations and sponsorships shall be documented and recorded by the office of the Managing Director. A register of donations and sponsorships shall be kept in the office of the Managing Director for a period of 7 years.

## 5. Reporting and Disclosure

- 5.1. **Annual Reporting:** The company will publish an annual report detailing all donations and sponsorships made by BEZA to the employees, stakeholders and its shareholders.
- 5.2. **Public Disclosure:** Donations and sponsorships will be publicly disclosed on the company's website or other media.

## 6. Consequences of Non-Compliance

Failure to comply with this policy may result in:

- 6.1. **Disciplinary action:** Disciplinary action, up to and including termination.
- 6.2. **Reputation damage:** Damage to the company's reputation and loss of public trust.

## 7. Review and Revision

- 7.1. This policy will be reviewed and revised as necessary to ensure compliance with applicable laws and regulations.





## Enterprise Risk Management (ERM) Policy

Name of the Document	Enterprise Risk Management (ERM) Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** The purpose of this policy is to:
  - 1.1.1 **Ensure risk awareness:** Ensure that all employees are aware of the risks associated with our business and their roles in managing those risks.
  - 1.1.2 **Identify and assess risks:** Identify and assess risks that may impact our ability to achieve our strategic objectives.
  - 1.1.3 **Manage risks:** Develop and implement strategies to manage risks and minimize their impact.
  - 1.1.4 **Monitor and review:** Continuously monitor and review our risk management processes to ensure they remain effective.
- 1.2. **Scope:** This policy applies to all employees, Business Partners, sub-consultants, and third-party service providers of BEZA.

## 2. Risk Management Objectives

- 2.1. **Identify and Assess Risks:** Identify potential risks and assess their likelihood and impact.
- 2.2. **Mitigate Risks:** Develop and implement strategies to mitigate or manage identified risks.
- 2.3. **Monitor and Review Risks:** Continuously monitor and review risks to ensure effective management.

## 3. Related Policy

- 3.1. This Enterprise Risk Management policy is related to Project Risk Management Policy.
- 3.2. Enterprise Risk Management policy: governs and regulates the management of risks within BEZA's business operations
- 3.3. Project Risk Management Policy: governs and regulates the management of risks within a Project under BEZA's management at that moment

## 4. Policy Statement

- 4.1. BEZA is committed to managing risks to a satisfactory level, which risks may impact our ability to achieve our strategic objectives.
- 4.2. This Enterprise Risk Management (ERM) Policy Statement outlines our approach to identifying, assessing, and managing risks across the organization.
- 4.3. **Policy Statement Definitions**
  - 4.3.1. **Risk:** is an event or circumstance that has the potential to impact on an organization's ability to achieve its objectives
  - 4.3.2. **Enterprise Risk Management:** is a comprehensive and integrated approach to identifying, assessing, and managing risks that may impact BEZA's ability to achieve its objectives.
  - 4.3.3. **Risk Assessment** is the process of identifying, analyzing, and evaluating potential risks that may impact an organization's ability to achieve its objectives.



- 4.3.4. The Risk assessment in BEZA should involve identifying, analyzing, and evaluating risks that could impact BEZA's ability to achieve its objectives. The risks to be assessed include but are not limited to the following; integrity compliance, operational, strategic, financial, compliance and legal, reputational, technological and environmental and social risks.
- 4.3.5. **BEZA must manage the Sanctionable Practice(s):** these include corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice, carried out by employees, which warrants an investigation, an audit or a sanction proceeding.
- 4.4. **Sanctionable Practices (Risks) which BEZA has Zero tolerance of are:**
  - 4.4.1. Corrupt practices
  - 4.4.2. Fraudulent practices
  - 4.4.3. Collusive practices
  - 4.4.4. Coercive practices
  - 4.4.5. Obstructive practices

## 5. Risk Management Framework

- 5.1. **Risk Identification:** Identify potential risks through a combination of techniques like brainstorming sessions, risk workshops, and review of organizational documentation, risk assessments, audits, and reviews.
- 5.2. **Risk Assessment:** Assess identified risks using a risk matrix or other suitable methodology. Assess the likelihood and impact of identified risks.
- 5.3. **Risk Prioritization:** Prioritize risks based on their likelihood and impact.
- 5.4. **Risk Mitigation:** Develop and implement strategies to mitigate or manage identified risks.
- 5.5. **Risk Monitoring and Review:** Continuously monitor and review risks to ensure effective management.

## 6. Enterprise Risk Categories

- 6.1. **Strategic Risks:** Risks related to the organization's strategic objectives and direction.
- 6.2. **Operational Risks:** Risks related to the organization's operations, including project delivery, supply chain, and employee safety.
- 6.3. **Financial Risks:** Risks related to the organization's financial management, including funding, liquidity, and credit risks.
- 6.4. **Compliance Risks:** Risks related to the organization's compliance with laws, regulations, industry standards, and integrity compliance.
- 6.5. **Reputation Risks:** Risks related to the organization's reputation and brand.
- 6.6. **Environmental Risks:** Risks that affect an organization's environmental sustainability, such as climate change or pollution.



## 7. Enterprise Risk Assessment

- 7.1. **Risk Assessment Process:** The risk assessment process shall consist of the following steps:
- 7.1.1. *Risk Identification:* Identify potential risks that may impact our ability to achieve our strategic objectives.
  - 7.1.2. *Risk Analysis:* Analyze the identified risks to determine their likelihood and potential impact.
  - 7.1.3. *Risk Evaluation:* Evaluate the risks to determine their level of risk and prioritize them accordingly.
  - 7.1.4. *Risk Mitigation:* Develop and implement strategies to mitigate or manage the identified risks.
- 7.2. **Risk Identification**
- 7.2.1. *Brainstorming sessions:* Conduct brainstorming sessions with employees, contractors, and third-party service providers to identify potential risks.
  - 7.2.2. *Review of historical data:* Review historical data, including incident reports, audit findings, and financial statements, to identify potential risks.
  - 7.2.3. *Industry research:* Conduct industry research to identify potential risks and emerging trends.
  - 7.2.4. *Business Partner or Sub-contractor , supplier and employee Due Diligence*
- 7.3. **Risk Analysis**
- 7.3.1. *Likelihood assessment:* Assess the likelihood of each identified risk using a likelihood scale (e.g., high, medium, low).
  - 7.3.2. *Impact assessment:* Assess the potential impact of each identified risk using an impact scale (e.g., high, medium, low).
  - 7.3.3. *Risk scoring:* Calculate a risk score for each identified risk based on its likelihood and impact assessments.
- 7.4. **Risk Evaluation**
- 7.4.1. *Risk prioritization:* Prioritize the identified risks based on their risk scores.
  - 7.4.2. *Risk categorization:* Categorize the identified risks into different categories (e.g., strategic, operational, financial, compliance).
  - 7.4.3. *Risk reporting:* Report on the identified risks and their corresponding risk scores to senior management and the Risk Management Committee.
- 7.5. **Risk Mitigation**
- 7.5.1. *Risk mitigation strategies:* Develop and implement risk mitigation strategies for each identified risk.
  - 7.5.2. *Risk monitoring:* Continuously monitor the identified risks and their corresponding risk mitigation strategies.
  - 7.5.3. *Risk review:* Regularly review the identified risks and their corresponding risk mitigation strategies to ensure they remain effective.



## 7.6. Risk Assessment Tools and Techniques

The following risk assessment tools and techniques may be used:

- 7.6.1. **Risk assessment templates:** Use risk assessment templates to document identified risks and their corresponding risk scores. BEZA uses Risk Register and Risk Matrix
- 7.6.2. **Risk matrices:** Use risk matrices to prioritize identified risks based on their likelihood and impact assessments.
- 7.6.3. **Decision trees:** Use decision trees to evaluate different risk mitigation strategies and their corresponding costs and benefits.

## 7.7. Risk Assessment Techniques

- 7.7.1. SWOT Analysis: Identifying strengths, weaknesses, opportunities, and threats.
- 7.7.2. Decision Trees: Evaluating different risk scenarios and their potential outcomes.
- 7.7.3. Sensitivity Analysis: Evaluating the potential impact of changes in assumptions or variables.
- 7.7.4. Probability-Impact Matrix: Evaluating the likelihood and potential impact of identified risks.

## 7.8. Risk Assessment Frequency

The risk assessment process shall be conducted:

- 7.8.1. **Annually:** Conduct a comprehensive risk assessment annually to identify and assess new risks.
- 7.8.2. **Quarterly:** Conduct a quarterly review of the risk assessment to ensure that risks are properly managed and mitigated.
- 7.8.3. **Monthly:** Conduct a monthly review of the risk assessment to ensure that the risks are managed out of BEZA's operations
- 7.8.4. **As needed:** Conduct a risk assessment as needed to address emerging risks or changes in the business environment.

## 8. Compliance Risk Assessment

- 8.1. BEZA is committed to maintaining the highest standards of compliance with all applicable laws, regulations, and industry standards.
- 8.2. This Compliance Risk Assessment is designed to identify, assess, and prioritize compliance risks that may impact our business.
  - 8.2.1. BEZA will use the COSO and ISO 31000: Risk Management Framework as the reference framework in all risk management including Risk Assessment.
  - 8.2.2. BEZA does Business Partner, employee and sub-Consultants Due Diligence before the party is recruited into the project contract, and during the life of the project.
- 8.3. **Compliance Risk Categories**

The following compliance risk categories have been identified:

  - 8.3.1. **Regulatory Compliance:** Risks related to non-compliance with laws, regulations, and industry standards.



- 8.3.2. *Financial Compliance*: Risks related to non-compliance with financial laws, regulations, and industry standards.
- 8.3.3. *Data Protection and Privacy*: Risks related to non-compliance with data protection and privacy laws and regulations.
- 8.3.4. *Anti-Corruption and Bribery*: Risks related to non-compliance with anti-corruption and bribery laws and regulations. BEZA should manage out corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice **at all times** by timeously identifying the red-flags and managing them before the commission of such practice(s)
- 8.3.5. *Trade Compliance*: Risks related to non-compliance with trade laws and regulations.

#### 8.4. **Compliance Risk Assessment Methodology**

The following methodology was used to assess compliance risks:

- 8.4.1. *Risk Identification*: Compliance risks are identified through a review of laws, regulations, and industry standards, as well as through interviews with employees and subject matter experts.
- 8.4.2. *Risk Assessment*: Compliance risks are assessed using a risk matrix, which considered the likelihood and potential impact of each risk.
- 8.4.3. *Risk Prioritization*: Compliance risks are prioritized based on their assessed likelihood and potential impact.

#### 8.5. **Risk Components to document in Assessment process**

- 8.5.1. *Risk Event*: The specific event or circumstance that may occur.
- 8.5.2. *Risk Cause*: The underlying reason or factor that contributes to the risk event.
- 8.5.3. *Risk Effect*: The potential impact or consequence of the risk event.
- 8.5.4. *Risk Mitigation*: The strategies or controls implemented to reduce the likelihood or impact of the risk event.

#### 8.6. **Compliance Risk Assessment Results**

- 8.6.1. The results should be documented in the Risk Register and later reduced into a report to the Board and the General Manager for improvements in the operations.

## 9. Enterprise Compliance Risk Assessment Procedures

- BEZA categorizes Compliance Risk Assessment into; Regulatory Compliance Risks, Contractual Compliance Risks and Financial Compliance Risks, BEZA uses the COSO Risk Assessment Framework. Identify compliance risks, which are likely to happen, and those risks which have happened. Mitigate those risks which you have identified and reported so that their re-occurrence will be minimized.

#### 9.1. **Regulatory Compliance Risks**

- 9.1.1. *Environmental regulations*: Non-compliance with environmental regulations, such as pollution control and waste management.



9.1.2. *Health and safety regulations*: Non-compliance with health and safety regulations, such as workplace safety and employee training.

9.1.3. *Labor laws and regulations*: Non-compliance with labor laws and regulations, such as employment standards and worker rights.

## 9.2. **Contractual Compliance Risks**

9.2.1. *Contract terms and conditions*: Non-compliance with contract terms and conditions, such as payment schedules and deliverables.

9.2.2. *Sub-consultant management*: Non-compliance with subcontractor management regulations, such as subcontractor selection and monitoring.

## 9.3. **Financial Compliance Risks**

9.3.1. *Financial reporting*: Non-compliance with financial reporting regulations, such as accounting standards and tax laws.

9.3.2. *Anti-corruption and bribery*: Non-compliance with anti-corruption and bribery regulations, such as gift policies and conflict of interest.

# 10. Risk Mitigation Strategies

10.1. **Implement compliance policies and procedures**: Develop and implement compliance policies and procedures to ensure regulatory, contractual, and financial compliance.

10.2. **Conduct regular training and audits**: Conduct regular training and audits to ensure compliance with regulations, contracts, and financial requirements.

10.3. **Monitor and report compliance**: Monitor and report compliance with regulations, contracts, and financial requirements to ensure timely identification and mitigation of compliance risks.

# 11. Compliance Risk Management Plan

11.1. **Compliance risk assessment**: Conduct regular compliance risk assessments to identify and prioritize compliance risks. All operational departments should be involved in risk management of which compliance risk assessment is one of them. The compliance manager should be responsible for this task.

11.2. **Compliance risk mitigation**: Implement compliance risk mitigation strategies to reduce the likelihood and impact of compliance risks. The heads of the operational units/ departments or country representatives should continuously monitor compliance issues, and mitigate against the compliance risks before they occur. The compliance manager should be responsible for BEZA's compliance efforts.

11.3. **Compliance monitoring and reporting**: Monitor and report compliance with regulations, contracts, and financial requirements to ensure timely identification and mitigation of compliance risks.



## 12. Risk Management Tools and Techniques

- 12.1. Risk Matrix: A tool used to assess and prioritize risks based on their likelihood and impact.
- 12.2. Sensitivity Analysis: A technique used to analyze the impact of changes in organizational variables on the organization's outcomes.
- 12.3. Decision Trees: A tool used to evaluate different courses of action and their potential outcomes.
- 12.4. Monte Carlo Simulations: A technique used to analyze the impact of uncertainty on organizational outcomes.

## 13. Roles and Responsibilities

- 13.1. **Risk Management Committee:** Responsible for overseeing the development and implementation of the ERM policy and ensuring that risks are properly identified, assessed, and managed.
- 13.2. **Risk Manager:** Responsible for developing and implementing the ERM framework, and for monitoring and reviewing risks.
- 13.3. **Department Heads:** Responsible for identifying and reporting risks within their departments, and for implementing risk mitigation strategies.
- 13.4. **Risk Owners:** Risk owners are responsible for managing specific risks and implementing risk mitigation strategies.
- 13.5. **Employees:** All employees are responsible for identifying and reporting risks, and for implementing risk mitigation strategies in their areas of responsibility.

## 14. Monitoring and Review

- 14.1. Our risk management processes will be continuously monitored and reviewed to ensure they remain effective. This will include:
  - 14.1.1. **Regular risk assessments:** Regular risk assessments (Daily) will be conducted to identify and assess new risks.
  - 14.1.2. **Risk reporting:** Risk reports will be provided to the Risk Management Committee and senior management on a regular basis.
  - 14.1.3. **Review of risk management processes:** Our risk management processes will be reviewed annually to ensure they remain effective and aligned with our strategic objectives.

## 15. Training and Awareness

- 15.1. **Risk Management Training:** Provide training to employees on risk management principles, tools, and techniques.
- 15.2. **Risk Awareness:** Ensure that all employees are aware of the risks associated with the organization and the measures being taken to mitigate them.



## 16. Review and Revision

- 16.1. **Regular Review:** Review the ERM policy regularly to ensure it remains effective and relevant.
- 16.2. **Revision:** Revise the policy as necessary to reflect changes in the organization's risk management approach or to address emerging risks.



## 17. Appendix

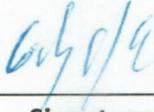
### Definition of Additional Terms

- 17.1. **Sanctionable Practice(s):** includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice, carried out in connection with a IfDB Group-Financed Activity, which warrants an investigation, an audit or a sanctions proceeding.
- 17.1.1. **Corrupt practices:** The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party.
- 17.1.2. **Fraudulent practices:** Any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- 17.1.3. **Collusive practices:** An arrangement between two or more parties designed to achieve an improper purpose, including to improperly influence the actions of another party.
- 17.1.4. **Coercive practices:** Impairing or harming or threatening to directly or indirectly impair or harm any party or the property of the party, to improperly influence the actions of a party.
- 17.1.5. **Obstructive practices:**
- 17.1.5.1. Destroying, falsifying, altering all concealing of evidence material to a bank investigation, or making false statements to investigators, with the intent to impede a bank group investigation.
- 17.1.5.2. Threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to a bank group investigation or from pursuing investigation or,
- 17.1.5.3. acts intended to impede the exercise of the AfBD Group's contractual rights of audits or inspection or access to information.





## Environmental Protection Policy

<b>Name of the Document</b>	<b>Environmental Protection Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



## 1. Purpose and Scope

- 1.1. **Purpose:** The purpose of this policy is to outline our commitment to environmental protection and to provide a framework for implementing environmentally responsible practices in our civil engineering operations.
- 1.2. **Scope:** This policy applies to all BEZA employees, business partners and sub-consultants and covers all our civil engineering consulting services, including:
  - 1.2.1. Construction sites: Our construction sites including road construction, bridge construction, and building construction.
  - 1.2.2. Design and planning: Our design and planning activities, including environmental impact assessments and sustainability studies.
  - 1.2.3. Materials sourcing: Our materials sourcing activities, including procurement of materials and equipment.

## 2. Objectives

Our environmental protection objectives are:

- 2.1. Minimize environmental impact: Minimize the environmental impact of our civil engineering operations, including reducing waste, conserving resources, and protecting biodiversity.
- 2.2. Comply with regulations: Comply with all applicable environmental laws, regulations, and standards related to civil engineering operations.
- 2.3. Promote sustainability: Promote sustainability in our civil engineering operations, including designing and constructing sustainable infrastructure and using sustainable materials.
- 2.4. Raise environmental awareness: Raise environmental awareness among our employees, contractors, and subcontractors, and promote environmentally responsible practices.

## 3. Policy Statement

We are committed to:

- 3.1. Complying with environmental laws and regulations: We will comply with all applicable environmental laws, regulations, and standards.
- 3.2. Reducing our environmental footprint: We will strive to minimize our impact on the environment by reducing energy consumption, waste, and emissions.
- 3.3. Conserving natural resources: We will promote the conservation of natural resources, including water, energy, and materials.
- 3.4. Promoting sustainable practices: We will promote sustainable practices in all aspects of our business, including procurement, operations, and transportation.



- 3.5. Educating and training employees: We will educate and train our employees on environmental protection and sustainable practices.
- 3.6. Continuously improving our environmental performance: We will regularly review and assess our environmental performance and implement improvements as needed.

## 4. Responsibilities

- 4.1. Management: Provide leadership and resources to implement environmentally responsible practices in our civil engineering operations.
- 4.2. Employees: Comply with environmental policies and procedures and report environmental incidents or concerns.
- 4.3. Contractors and subcontractors: Comply with our environmental policies and procedures and ensure that their employees and subcontractors do the same.

## 5. Implementation

To implement this policy, we will:

- 5.1. Conduct environmental assessments: Conduct environmental impact assessments and sustainability studies to identify potential environmental impacts and opportunities for improvement.
- 5.2. Develop environmental procedures: Develop procedures to minimize waste, conserve resources, and protect biodiversity in our civil engineering operations.
- 5.3. Provide training and awareness: Provide training and awareness programs for employees, contractors, and subcontractors on environmental policies and procedures.
- 5.4. Monitor and review: Monitor and review our environmental performance regularly, and report on our progress towards our environmental objectives.

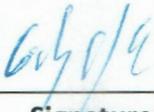
## 6. Review and Revision

- 6.1. This policy will be reviewed and revised annually, or as necessary, to ensure it remains effective and relevant.





## Ethics and Code of Conduct Policy

Name of the Document	Ethics and Code of Conduct Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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# 1. BEZA's Ethics

## 1.1. Purpose and Scope

### 1.1.1. **Purpose:**

- 1.1.1.1. Establish a culture of ethics and integrity: Promote a culture that values honesty, transparency, and accountability.
- 1.1.1.2. Provide guidance on ethical decision-making: Offer guidance on how to make decisions that align with our values and principles.
- 1.1.1.3. Ensure compliance with laws and regulations: Ensure that we comply with all applicable laws and regulations.
- 1.1.2. **Scope:** Applies to all employees, sub-consultants, business partners and stakeholders' officers, directors, and third-party service providers.

## 1.2. Ethical Principles

- 1.2.1. **Honesty and Integrity:** Conduct business with honesty, integrity, and transparency.
- 1.2.2. **Fairness and Respect:** Treat all stakeholders with fairness, respect, and dignity.
- 1.2.3. **Compliance with Laws and Regulations:** Comply with all relevant laws, regulations, and industry standards.
- 1.2.4. **Confidentiality and Data Protection:** Protect confidential information and maintain data protection standards.
- 1.2.5. **Accountability:** We will be accountable for our actions and decisions.

## 1.3. Policy Statement of Ethics

- 1.3.1. BEZA is committed to maintaining the highest standards of ethics and integrity in all aspects of our business.
- 1.3.2. This Policy Statement of Ethics outlines our expectations for ethical behavior and provides guidance on how to make decisions that align with our values.
- 1.3.3. Part of our ethical conduct is to observe that none of our employees commit or cause another party to commit **Multilateral Development Banks (MDB)** and **AfDB Group Sanctionable Practices**. BEZA has **Zero tolerance of:**
  - 1.3.3.1. Corrupt practices
  - 1.3.3.2. Fraudulent practices
  - 1.3.3.3. Collusive practices
  - 1.3.3.4. Coercive practices
  - 1.3.3.5. Obstructive practices



## 1.4. BEZA's Expectations

We expect all employees, officers, directors, contractors, and third-party service providers to:

- 1.4.1. **Act with integrity:** Act with honesty, transparency, and accountability.
- 1.4.2. **Comply with laws and regulations:** Comply with all applicable laws and regulations.
- 1.4.3. **Report unethical behavior:** Report any unethical behavior or suspected wrongdoing.
- 1.4.4. **Cooperate with investigations:** Cooperate with investigations into unethical behavior or suspected wrongdoing.

## 1.5. Consequences of Non-Compliance to BEZA's Ethics

Failure to comply with this policy may result in:

- 1.5.1. **Disciplinary action:** Disciplinary action, up to and including termination.
- 1.5.2. **Legal action:** Legal action, including fines and penalties.

## 1.6. Reporting Unethical Behavior

If you suspect unethical behavior or wrongdoing, please report it to:

- 1.6.1. Your supervisor or manager: Your supervisor or manager.
- 1.6.2. The Compliance Officer: The Compliance Officer.
- 1.6.3. The Ethics Hotline: The Ethics Hotline.

## 1.7. Code of Conduct and Code of Ethics

- 1.7.1. Refer to Sections 2, 3, 4 and 5 of this policy below.
  - 1.7.1.1. Section 2: BEZA Code of Ethics
  - 1.7.1.2. Section 3: Acknowledgement of the Code of Ethics
  - 1.7.1.3. Section 4: BEZA Code of Conduct
  - 1.7.1.4. Section 5: Acknowledgement of the Code of Conduct

## 1.8. Reporting and Whistleblowing

- 1.8.1. **Reporting Mechanism:** Establish a reporting mechanism for employees to report unethical behavior or concerns. Refer to Whistle blowing Policy.
- 1.8.2. **Whistleblowing Policy:** Protect whistleblowers from retaliation and ensure confidentiality shared information.
- 1.8.3. **Investigation and Action:** Investigate reports of unethical behavior and take prompt action to address concerns. Refer to Anti-Bribery (Fraud) Investigation policy



## 1.9. Training and Awareness

- 1.9.1. **Ethics Training:** Provide regular ethics training for employees to promote awareness and understanding.
- 1.9.2. **Code of Conduct Training:** Provide training on the code of conduct and expectations for employee behavior.
- 1.9.3. **Compliance Training:** Provide training on compliance with all policies/procedures that make up the BEZA's Integrity Compliance Program (ICP), laws, regulations, industry standards.

## 1.10. Monitoring and Review

- 1.10.1. **Regular Review:** Regularly review and update the ethical policy to ensure it remains effective and relevant.
- 1.10.2. **Audit and Compliance:** Conduct regular audits to ensure compliance with the ethical policy and code of conduct.
- 1.10.3. **Disciplinary Action:** Take disciplinary action against employees who violate the ethical policy or code of conduct.

## 1.11. Leadership and Accountability

- 1.11.1. **Tone at the Top:** Demonstrate a commitment to ethics and integrity from senior leadership.
- 1.11.2. **Accountability:** Hold employees and management accountable for adhering to the ethical policy and code of conduct.
- 1.11.3. **Ethics Committee:** Establish an ethics committee to oversee the implementation of the ethical policy and provide guidance on ethics-related matters.

## 1.12. Policy Implementation

- 1.12.1. *The Compliance and Monitoring Manager will receive all forms of unethical conduct and institute an investigation to establish the extent of unethical misconduct.*
- 1.12.2. *The Compliance and Monitoring Manager should compile a report to the Human Resources Manager, for the Human Resources Manager to institute Disciplinary Action*
- 1.12.3. *Disciplinary action should comply with the Labour Relations Act*



## 2. BEZA's Code of Ethics

### 2.1. Preamble

- 2.1.1. BEZA Code of Ethics outlines the principles and values that guide the company's behavior and decision-making.
- 2.1.2. The purpose of this Code of Ethics is to establish a set of principles and values that guide our behavior and decision-making as a civil engineering company.

### 2.2. Core Values

- 2.2.1. **Integrity:** We act with honesty, transparency, and accountability in all our interactions.
- 2.2.2. **Professionalism:** We maintain the highest standards of professionalism, expertise, and competence in our work.
- 2.2.3. **Respect:** We treat all stakeholders with respect, dignity, and fairness.
- 2.2.4. **Responsibility:** We take responsibility for our actions and their impact on the environment, society, and our clients.
- 2.2.5. **Innovation:** We encourage innovation, creativity, and continuous improvement in our work.

### 2.3. Ethical Principles

- 2.3.1. **Avoid Conflicts of Interest:** We avoid conflicts of interest and ensure that our decisions are not influenced by personal gain or bias.
- 2.3.2. **Avoid AfDB Group-wide Sanctionable Practices;** corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice
- 2.3.3. **Protect Confidential Information:** We protect confidential information and maintain the trust of our clients and stakeholders.
- 2.3.4. **Comply with Laws and Regulations:** We comply with all relevant laws, regulations, and industry standards.
  - 2.3.4.1. We will **not pay facilitation fees** to anyone to get the favours in the industry.
  - 2.3.4.2. We will **NOT participate in bribing** to get contracts.
- 2.3.5. **Respect Human Rights:** We respect human rights and avoid any actions that may infringe on the rights of others.
- 2.3.6. **Protect the Environment:** We protect the environment and strive to minimize our impact on the natural world.

### 2.4. Professional Conduct

- 2.4.1. **Maintain Competence:** We maintain our competence and expertise through ongoing education and training.
- 2.4.2. **Avoid Misrepresentation:** We avoid misrepresenting our *qualifications, experience, or expertise.*



- 2.4.3. **Respect Colleagues and Peers:** We treat our colleagues and peers with respect, dignity, and fairness.
- 2.4.4. **Report Unethical Behavior:** We report any unethical behavior or concerns to the appropriate authorities.

## 2.5. Accountability

- 2.5.1. **Take Responsibility:** We take responsibility for our actions and their impact on the environment, society, and our clients.
- 2.5.2. **Investigate Complaints:** We investigate complaints and concerns in a fair and transparent manner.
- 2.5.3. **Disciplinary Action:** We take disciplinary action against employees who violate this Code of Ethics.

## 2.6. Employee's Acknowledgement of BEZA Code of Ethics

- 2.6.1. Every employee of BEZA should Annually read, understand, and be trained in the BEZA Code of Ethics.
- 2.6.2. Every employee should sign Annually, as acknowledgement of an undertaking to comply with BEZA Code of Ethics.

## 2.7. Review and Revision

- 2.7.1. **Regular Review:** We regularly review and update this Code of Ethics to ensure it remains effective and relevant.
- 2.7.2. **Stakeholder Feedback:** We seek feedback from stakeholders on this Code of Ethics and incorporate it into our review and revision process.

## 2.8. Conclusion

- 2.8.1. This Code of Ethics is a fundamental part of our company's culture and values.
- 2.8.2. We expect all employees to adhere to this Code of Ethics and to report any concerns or unethical behavior to the appropriate authorities.



### 3. Acknowledgement of Code of Ethics by an employee

#### 3.1. Acknowledgement Of Code of Ethics

- 3.1.1. I, [Employee Name], hereby acknowledge that I have received and read BEZA's Code of Ethics.
- 3.1.2. I understand that this Code of Ethics outlines the company's expectations for ethical behavior and decision-making, and that it applies to all employees.

#### 3.2. I acknowledge that I am expected to:

- 3.2.1. Adhere to the principles and values outlined in the Code of Ethics
- 3.2.2. Report any concerns or unethical behavior to the appropriate authorities
- 3.2.3. Cooperate fully with any investigations or inquiries related to the Code of Ethics
- I understand that failure to comply with the Code of Ethics may result in disciplinary action, up to and including termination of employment.
  - I acknowledge that I have read and understood the Code of Ethics, and that I will uphold the principles and values outlined therein.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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

Employee ID: \_\_\_\_\_

**Note:** Please return a signed copy of this acknowledgement to the Human Resources department.



## 4. BEZA's Code of Conduct

- 4.1.1. BEZA is committed to maintaining the highest standards of integrity, ethics, and professionalism.
- 4.1.2. This Code of Conduct outlines the principles and behaviors expected of all employees, officers, and directors.

### 4.2. Our Commitment

We are committed to:

- 4.2.1. **Integrity:** Acting with integrity, honesty, and transparency in all our interactions.
- 4.2.2. **Professionalism:** Maintaining the highest standards of professionalism, including competence, diligence, and impartiality.
- 4.2.3. **Respect:** Treating all individuals with respect, dignity, and fairness, regardless of their background, culture, or position.
- 4.2.4. **Compliance:** Complying with all applicable laws, regulations, and industry standards.
- 4.2.5. **Confidentiality:** Maintaining confidentiality and protecting sensitive information.

### 4.3. Expected Behaviors

We expect all employees, officers, and directors to:

- 4.3.1. **Act with integrity:** Act with integrity, honesty, and transparency in all interactions.
- 4.3.2. **Maintain confidentiality:** Maintain confidentiality and protect sensitive information.
- 4.3.3. **Avoid conflicts of interest:** Avoid conflicts of interest and disclose any potential conflicts.
- 4.3.4. **Comply with laws and regulations:** Comply with all applicable laws, regulations, and industry standards.
- 4.3.5. **Respect colleagues and clients:** Treat all colleagues and clients with respect, dignity, and fairness.

### 4.4. Specific Guidelines

- 4.4.1. **Gifts and hospitality:** Avoid accepting gifts or hospitality that could be perceived as influencing business decisions.
- 4.4.2. **Conflicts of interest:** Disclose any potential conflicts of interest and avoid participating in decisions that may be influenced by personal interests.
- 4.4.3. **Confidentiality:** Maintain confidentiality and protect sensitive information, including client information and company proprietary information.
- 4.4.4. **Harassment and bullying:** Treat all colleagues and clients with respect, dignity, and fairness, and avoid engaging in harassment or bullying behavior.
- 4.4.5. **Avoid AfDB Group-wide Sanctionable Practices;** corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice.



## 4.5. Reporting Violations

If you become aware of any violation of this Code of Conduct, you must report it to:

- 4.5.1. **Supervisor or manager:** Your supervisor or manager.
- 4.5.2. **Compliance and Monitoring Manager**
- 4.5.3. **Human Resources:** The Human Resources department.
- 4.5.4. **Anonymous reporting:** Through our anonymous reporting mechanism.

## 4.6. Consequences of Non-Compliance

Failure to comply with this Code of Conduct may result in:

- 4.6.1. **Disciplinary action:** Disciplinary action, up to and including termination.
- 4.6.2. **Legal action:** Legal action, including fines and penalties.

## 4.7. Employee's Acknowledgement of BEZA Code of Conduct

- 4.7.1. Every employee of BEZA should Annually read, understand, and be trained in the BEZA Code of Conduct.
- 4.7.2. Every employee should sign Annually, as an acknowledgement of an undertaking to comply with the BEZA Code of Conduct.

## 4.8. Review and Revision

- 4.8.1. This Code of Conduct will be reviewed and revised annually, or as necessary, to ensure it remains effective and relevant.



## 5. Employee Acknowledgement of Code of Conduct

### 5.1. Acknowledgement Of Code of Conduct

5.1.1. I, [Employee Name], acknowledge that I have received and read the Code of Conduct of BEZA, a civil engineering consulting company.

### 5.2. Understanding and Commitment

5.2.1. I understand that the Code of Conduct outlines the principles and behaviors expected of all employees, officers, and directors of BEZA. I commit to:

- 5.2.1.1. **Upholding the Code:** Upholding the principles and behaviors outlined in the Code of Conduct.
- 5.2.1.2. **Reporting Violations:** Reporting any violations of the Code of Conduct to my supervisor, manager, or the Human Resources department.
- 5.2.1.3. **Cooperating with Investigations:** Cooperating fully with any investigations into alleged violations of the Code of Conduct.

### 5.3. Confidentiality and non-disclosure

5.3.1. I acknowledge that I have access to confidential and proprietary information about BEZA and its clients. I commit to:

- 5.3.1.1. **Maintaining Confidentiality:** Maintaining the confidentiality of all confidential and proprietary information.
- 5.3.1.2. **Not Disclosing Information:** Not disclosing any confidential or proprietary information to unauthorized parties.

### 5.4. Acknowledgement and Agreement

5.4.1. By signing below, I acknowledge that I have read, understood, and will comply with the Code of Conduct of BEZA. I understand that failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination.

#### Signature

I, [Employee Name], hereby acknowledge and agree to the above.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Note:** Please return a signed copy of this acknowledgement to the Human Resources department.



## 6. Third-party (Suppliers/ Contractor) Acknowledgement of Code of Conduct

### 6.1. Acknowledgement Of Code of Conduct

6.1.1. I, [Supplier/ contractor Name], acknowledge that I have received and read the Code of Conduct of BEZA, a civil engineering consulting company.

### 6.2. Understanding and Commitment

6.2.1. I understand that the Code of Conduct outlines the principles and behaviors expected of all third-part employees, officers, and directors. I commit to:

- 6.2.1.1. **Upholding the Code:** Upholding the principles and behaviors outlined in the Code of Conduct.
- 6.2.1.2. **Reporting Violations:** Reporting any violations of the Code of Conduct to my supervisor, manager, or the Human Resources department.
- 6.2.1.3. **Cooperating with Investigations:** Cooperating fully with any investigations into alleged violations of the Code of Conduct.

### 6.3. Confidentiality and non-disclosure

6.3.1. I acknowledge that I have access to confidential and proprietary information about BEZA and its other parties including its clients. I commit to:

- 6.3.1.1. **Maintaining Confidentiality:** Maintaining the confidentiality of all confidential and proprietary information.
- 6.3.1.2. **Not Disclosing Information:** Not disclosing any confidential or proprietary information to unauthorized parties.

### 6.4. Acknowledgement and Agreement

6.4.1. By signing below, I acknowledge that I have read, understood, and will comply with the Code of Conduct of BEZA. I understand that failure to comply with the Code of Conduct may result in termination of contract, up to and including termination of the works contract.

#### Signature

I, [[Supplier/ contractor Name], hereby acknowledge and agree to the above.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



**Note:** Please return a signed copy of this acknowledgement to the Human Resources department.

## 7. Appendix

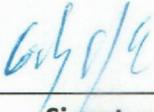
### Definition of Additional Terms

- 1.1. **Sanctionable Practice(s):** includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice, carried out in connection with a IfDB Group-Financed Activity, which warrants an investigation, an audit or a sanctions proceeding.
- 1.2. **Corrupt practices:** The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party.
- 1.3. **Fraudulent practices:** Any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- 1.4. **Collusive practices:** An arrangement between two or more parties designed to achieve an improper purpose, including to improperly influence the actions of another party.
- 1.5. **Coercive practices:** Impairing or harming or threatening to directly or indirectly impair or harm any party or the property of the party, to improperly influence the actions of a party.
- 1.6. **Obstructive practices:**
  - 1.6.1. Destroying, falsifying, altering all concealing of evidence material to a bank investigation, or making false statements to investigators, with the intent to impede a bank group investigation.
  - 1.6.2. Threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to a bank group investigation or from pursuing investigation or,
  - 1.6.3. acts intended to impede the exercise of the AfDB Group's contractual rights of audits or inspection or access to information.





## Executive Management Policy

<b>Name of the Document</b>	Executive Management Policy	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** To establish a framework for executive management that aligns with the company's strategic objectives.
- 1.2. **Scope:** Applies to all executive management team members, senior managers, and employees.

## 2. Company Overview

- 2.1. **Mission Statement:** striving for customer satisfaction by providing high quality services at competitive prices in the field of engineering design, design management, construction supervision, and project management.
- 2.2. **Vision Statement:** We seek sustainable growth and be one of the most trusted companies in the field of engineering consultancy. We also aim to be the most reliable and honest in our relationships with our clients.
- 2.3. **Core Values:**
  - 2.3.1. Honesty and Integrity
  - 2.3.2. Quality and Safety
  - 2.3.3. Accountability
  - 2.3.4. Teamwork and Collaboration
  - 2.3.5. Creativity and Innovation
  - 2.3.6. Flexibility
  - 2.3.7. Sustainability

## 3. Executive Management Structure

- 3.1. **Executive Management Team:** Comprises the CEO, CFO, COO, and other senior executives.
- 3.2. **Roles and Responsibilities:** Clearly define the roles and responsibilities of each executive management team member.
- 3.3. **Decision-Making Authority:** Establish clear decision-making authority and escalation procedures.

## 4. Strategic Objectives

- 4.1. Revenue Growth: Increase revenue by [20] % annually.
- 4.2. Market Expansion: Expand services into [3] new markets/ geographies.
- 4.3. Service Diversification: Develop and offer [2] new services.



- 4.4. **Employee Development:** Invest in employee training and development to enhance skills and expertise.

## 5. Operational Guidelines

- 5.1. **Business Development:** Establish a business development policy to guide marketing, sales, and proposal efforts.
- 5.2. **Project Management:** Implement a project management framework to ensure successful project delivery.
- 5.3. **Risk Management:** Develop a risk management policy to identify, assess, and mitigate risks.
- 5.4. **Quality Management:** Establish a quality management system to ensure high-quality services.
- 5.5. **Monitoring and Compliance:** Develop a Monitoring and Compliance Framework of crucial BEZA operations
- 5.6. **Integrity Resilience:** Develop a robust Integrity Program, where all ethics and values are emphasized and inculcated into all employees.
- 5.7. **Strong Financial Stewardship:** Develop efficient and effective financial and management controls, to ensure credibility of all financial reports.

## 6. Financial Management

- 6.1. **Budgeting:** Develop an annual budget to guide financial decision-making and fund all BEZA operations.
- 6.2. **Financial Reporting:** Establish regular financial reporting to track performance and make informed decisions.
- 6.3. **Cost Control:** Implement cost control measures to ensure efficient use of resources.

## 7. Human Resources

- 7.1. **Recruitment:** Develop a recruitment policy to attract and retain top talent.
- 7.2. **Employee Development:** Invest in employee training and development to enhance skills and expertise.
- 7.3. **Performance Management:** Establish a performance management system to evaluate employee performance.



## 8. Communication

- 8.1. **Internal Communication:** Foster open and transparent internal communication to ensure employees are informed and engaged.
- 8.2. **External Communication:** Establish clear external communication protocols to ensure effective communication with clients, partners, and stakeholders.

## 9. Management Oversight of BEZA operations

### 9.1. Management Oversight Structure

#### 9.1.1. General Manager

- 9.1.1.1. Oversees overall company operations
- 9.1.1.2. Responsible for strategic planning, business development, and financial management
- 9.1.1.3. Ensures company-wide policies and procedures are implemented and followed
- 9.1.1.4. Reports to the Executive Management

#### 9.1.2. Technical Manager

- 9.1.2.1. Oversees technical aspects of company operations
- 9.1.2.2. Responsible for ensuring technical quality, accuracy, and compliance with industry standards
- 9.1.2.3. Manages technical staff, including engineers, designers, and drafters
- 9.1.2.4. Reports to the General Manager

#### 9.1.3. Non-Technical Manager

- 9.1.3.1. Oversees non-technical aspects of company operations
- 9.1.3.2. Responsible for finance and accounting human resources, administration, marketing, and business support functions
- 9.1.3.3. Manages non-technical staff, including finance and accounting, administrative, HR, and marketing personnel
- 9.1.3.4. Reports to the General Manager

#### 9.1.4. Executive Management Meeting

- 9.1.4.1. *Frequency:* Quarterly or Bi-Monthly or Monthly
- 9.1.4.2. *Attendees:* General Manager, Technical Manager, Non-Technical Manager, and other senior executives
- 9.1.4.3. *Agenda:*
  - 9.1.4.3.1. Review company performance and progress
  - 9.1.4.3.2. Discuss strategic planning and business development
  - 9.1.4.3.3. Address technical and operational issues
  - 9.1.4.3.4. Review of financial performance and budget
  - 9.1.4.3.5. Make key decisions and set company direction



## 9.2. Additional Oversight Mechanisms

- 9.2.1. **Project Management Review:** Regular review of project progress, budget, and quality
- 9.2.2. **Technical Review Committee:** Regular review of technical designs, plans, and specifications
- 9.2.3. **Audit and Risk Committee:** Regular review of company risks, internal controls, and audit findings
- 9.2.4. **Compliance and Monitoring:** Regular review of company's non-compliance risks, business operations, laws, policies and ethics
- 9.2.5. **Board of Directors:** Quarterly or annual review of company performance, strategy, and governance

## 10. Review and Revision

- 10.1. **Regular Review:** Review of the executive management policy annually or as needed.
- 10.2. **Revision:** Revise the policy to reflect changes in the company's strategic objectives, market conditions, or industry trends.





## Finance and Accounting and Project Management Accounting Policy

Name of the Document	Finance and Accounting and Project Management Accounting Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** Establish a finance and accounting policy to ensure the company's financial resources are managed effectively and efficiently.
  - 1.1.1. *Ensure financial integrity:* Ensure the accuracy, completeness, and transparency of financial information.
  - 1.1.2. *Maintain financial discipline:* Maintain financial discipline and control over expenses, revenues, and assets.
  - 1.1.3. *Optimize financial performance:* Optimize financial performance and achieve business objectives.
- 1.2. **Scope:** This policy applies to all employees, business partners, sub-consultants, and consultants involved in financial transactions, reporting, and budgeting within the company.
  - 1.2.1. **Employees:** All employees, including finance and accounting staff, management, and directors.
  - 1.2.2. **Financial transactions:** All financial transactions, including accounting, budgeting, forecasting, and financial reporting.

## 2. Finance and Accounting Policy Statement

- 2.1. At BEZA, we are committed to maintaining the highest standards of financial integrity and transparency.
- 2.2. BEZA aims to safeguard company assets, support informed decision-making, and promote fiscal responsibility across all levels of the organization.
- 2.3. **Policy Principles:** BEZA is committed to:
  - 2.3.1. **Accuracy and completeness:** Ensuring the accuracy and completeness of financial information.
  - 2.3.2. **Transparency and disclosure:** Providing transparent and timely disclosure of financial information.
  - 2.3.3. **Compliance with laws and regulations:** Complying with all applicable laws, regulations, and accounting standards.
  - 2.3.4. **Financial prudence:** Exercising financial prudence and responsible financial management.

## 3. Financial Management Activities

### 3.1. Budgeting and Forecasting

- 3.1.1. **Budgeting:** Establish an annual budgeting process to allocate resources and prioritize expenditures.



- 3.1.2. **Annual Budget:** Developed by the Finance Manager in collaboration with department heads and approved by the Board.
- 3.1.3. **Project Budgets:** Each project must have a detailed budget, approved before initiation.
- 3.1.4. **Forecasting:** Quarterly reviews and updates to financial forecasts based on project performance and market conditions.

### 3.2. Expense Management

- 3.2.1. **Approval Process:** All expenses must be pre-approved by the appropriate manager.
- 3.2.2. **Reimbursement:** Employees must submit expense reports with receipts within 30 days of incurring the expense.
- 3.2.3. **Travel Expenses:** Follow the company's Travel Policy, ensuring cost-effective arrangements.

### 3.3. Invoicing and Revenue Recognition

- 3.3.1. **Client Invoicing:** Invoices must be issued promptly upon project milestones or deliverables as per contract terms.
- 3.3.2. **Revenue Recognition:** Revenue is recognized in line with the percentage of completion method for long-term projects.

### 3.4. Payroll and Compensation

- 3.4.1. Payroll is processed bi-weekly/monthly, in compliance with local labor laws.
- 3.4.2. Bonuses and incentives are awarded based on performance metrics and company profitability.

### 3.5. Financial Reporting and Compliance

- 3.5.1. **Monthly Reports:** Prepared by the Finance Manager and reviewed by the Chief Financial Officer (CFO) / General Manager (G.M).
- 3.5.2. **Annual Financial Statements:** Audited by an external accounting firm.
- 3.5.3. **Regulatory Compliance:** Ensure compliance with tax regulations, industry standards, and financial reporting laws.

### 3.6. Internal Controls and Auditing

- 3.6.1. **Segregation of Duties:** Financial responsibilities are divided to reduce the risk of errors and fraud.
- 3.6.2. **Internal Audits:** Conducted quarterly to ensure compliance with policies and detect discrepancies.
- 3.6.3. **External Audits:** Annual audits performed by certified external auditors.

### 3.7. Asset Management

- 3.7.1. All company assets must be recorded, tracked, and regularly reviewed.
- 3.7.2. Depreciation of assets is calculated in accordance with accounting standards.



### 3.8. Record Retention

- 3.8.1. Financial records must be retained for a minimum of 7 years.
- 3.8.2. Digital and physical records must be securely stored and accessible for audits

### 3.9. Other Financial Management Activities

- 3.9.1. **Financial Planning:** Develop a comprehensive financial plan to guide business decisions and ensure long-term sustainability.
- 3.9.2. **Cash Management:** Implement effective cash management practices to optimize liquidity and minimize risk.
- 3.9.3. **Investments:** Establish guidelines for investments, including criteria for investment decisions and risk management.

## 4. Accounting Principles and Standards

- 4.1. **Accounting Standards:** Comply with relevant accounting standards, International Financial Reporting Standards (IFRS).
- 4.2. **Financial Reporting:** Prepare accurate and timely financial reports, including balance sheets, income statements, and cash flow statements.
- 4.3. **Internal Controls:** Establish and maintain effective internal controls to ensure the accuracy, completeness, and validity of financial data. Refer to Internal Control Policy
- 4.4. **Audit and Compliance:** Ensure compliance with regulatory requirements and undergo regular audits to maintain transparency and accountability. The Auditing Standards to follow are: International Standards for Auditing (ISA)
- 4.5. All financial records must be accurate, complete, and up-to-date.

## 5. Policy Statement on Accounting Basis and Estimates

### 5.1. Accounting Basis

The company's financial statements are prepared on the:

- 5.1.1. **Accrual basis:** Accrual basis of accounting, which recognizes revenues and expenses when earned or incurred, regardless of when cash is received or paid.
- 5.1.2. **Historical cost:** Historical cost basis, which values assets and liabilities at their original cost or acquisition value.

### 5.2. Accounting Estimates

BEZA's financial statements require the use of estimates and assumptions that affect the reported amounts of assets, liabilities, revenues, and expenses.

These estimates and assumptions are based on:

- 5.2.1. **Historical experience:** Historical experience and trends.
- 5.2.2. **Industry trends:** Industry trends and developments.
- 5.2.3. **Economic conditions:** Economic conditions and forecasts.
- 5.2.4. **Management judgment:** Management judgment and expertise.

### 5.3. Key Accounting Estimates

The company's key accounting estimates include:



- 5.3.1. **Revenue recognition:** Revenue recognition, including the estimation of progress towards completion of contracts.
- 5.3.2. **Depreciation and amortization:** Depreciation and amortization, including the estimation of useful lives and residual values of assets.
- 5.3.3. **Allowance for doubtful accounts:** Allowance for doubtful accounts, including the estimation of uncollectible accounts receivable.
- 5.3.4. **Provisions for warranties and claims:** Provisions for warranties and claims, including the estimation of potential losses.
- 5.4. **Changes in Accounting Estimates**  
Changes in accounting estimates are accounted for:
  - 5.4.1. **Prospectively:** Prospectively, meaning that the change is applied to future periods only.
  - 5.4.2. **Retroactively:** Retroactively, meaning that the change is applied to prior periods, if material.
- 5.5. **Disclosure**
  - 5.5.1. The company will disclose all significant accounting policies and estimates in the notes to the financial statements.

## 6. Financial Management Responsibilities

- 6.1. **Chief Financial Officer (CFO):** Oversees all financial activities, ensures compliance with regulations, and reports to the Board of Directors.
- 6.2. **Finance Manager:** Manages day-to-day accounting operations, prepares financial reports, and assists in budgeting.
- 6.3. **Project Managers:** Monitor project budgets, approve project-related expenses, and ensure financial data is accurate.
- 6.4. **Finance and Accounting Team:** The finance and accounting team is responsible for financial transactions, accounting, budgeting, and financial reporting.
- 6.5. **Management:** Management is responsible for financial decision-making and oversight.
- 6.6. **All Employees:** Submit accurate financial reports and comply with financial procedures.

## 7. Procurement and Payment

- 7.1. **Procurement Policy:** Establish a procurement policy to ensure fair and transparent purchasing practices.
- 7.2. **Payment Terms:** Establish clear payment terms and conditions for suppliers and contractors.
- 7.3. **Expense Management:** Implement effective expense management practices to ensure accurate and timely reimbursement.

## 8. Risk Management

- 8.1. **Risk Assessment:** Conduct regular risk assessments to identify potential financial risks and opportunities.





## 12. Project Management Accounting Policy

### 12.1. Purpose and Scope

- 12.1.1. **Purpose:** Establish a project management accounting policy to ensure accurate financial management, transparency, and accountability of the projects under BEZA's Management.
- 12.1.2. **Scope:** Applies to all project managers, team members, and stakeholders involved in project financial management.

### 12.2. Project Financial Management Principles

- 12.2.1. **Accounting Standards:** Comply with relevant accounting standards, International Financial Reporting Standards (IFRS).
- 12.2.2. **Transparency:** Maintain transparency in project financial management, ensuring accurate and timely reporting.
- 12.2.3. **Accountability:** Ensure accountability for project finances, with clear roles and responsibilities.

### 12.3. Project Financial Planning

- 12.3.1. **Project Budgeting:** Establish a comprehensive project budget, including all costs, expenses, and revenues.
- 12.3.2. **Cost Estimation:** Develop accurate cost estimates, using historical data, industry benchmarks, and expert judgment.
- 12.3.3. **Financial Risk Management:** Identify and manage financial risks, including currency fluctuations, inflation, and changes in market conditions.

### 12.4. Project Financial Monitoring and Control

- 12.4.1. **Financial Reporting:** Provide regular financial reports, including project status, expenses, and revenues.
- 12.4.2. **Budget Variance Analysis:** Conduct regular budget variance analysis, identifying and addressing any discrepancies.
- 12.4.3. **Corrective Actions:** Implement corrective actions, as needed, to ensure project financial performance is on track.

### 12.5. Project Financial Closure

- 12.5.1. **Project Completion:** Formalize project completion, ensuring all financial transactions are accounted for.
- 12.5.2. **Final Financial Reporting:** Provide a final financial report, summarizing project costs, expenses, and revenues.



12.5.3. **Lessons Learned:** Document lessons learned, including financial management, best practices and areas for improvement.

**12.6. Compliance and Governance**

- 12.6.1. **Compliance:** Ensure compliance with relevant laws, regulations, and company policies.
- 12.6.2. **Governance:** Establish a governance structure, ensuring accountability and oversight of project financial management.

**12.7. Training and Awareness**

- 12.7.1. **Training:** Provide regular training on project financial management, accounting principles, and company policies.
- 12.7.2. **Awareness:** Promote awareness of the Project Management Accounting Policy among all project stakeholders.

**12.8. Review and Revision**

- 12.8.1. **Regular Review:** Review of the Project Management Accounting Policy regularly to ensure it remains effective and relevant.
- 12.8.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.

**12.9. Acknowledgment**

- 12.9.1. I acknowledge that I have read, understood, and will comply with the Finance and Accounting Policy of BEZA.

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_





## Policy Gifts and Hospitality Policy

<b>Name of the Document</b>	<b>Gifts and Hospitality Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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6. Review and Revision.....	4



## 1. Purpose and Scope

- 1.1. **Purpose:** BEZA is committed to maintaining the highest standards of integrity and transparency in all its business dealings. This policy aims to prevent bribery, corruption, and other unethical practices by establishing clear guidelines on gifts and hospitality.
- 1.2. **Scope:** This policy applies to all BEZA employees, officers, directors, business partners, sub-consultants, and third-party service providers.

## 2. Definitions

- 2.1. **Gift:** Any item of value, including but not limited to cash, goods, services, or entertainment.
- 2.2. **Hospitality:** Any form of entertainment, including but not limited to meals, travel, or accommodation.

## 3. Policy Statement and Guidelines

- 3.1. BEZA prohibits the offer, promise, or receipt of any gift or hospitality that could be perceived as a bribe or an attempt to influence a business decision.
- 3.2. **Policy Guidelines**
  - 3.2.1. **Gifts:** Employees are prohibited from:
    - 3.2.1.1. offering any gifts to clients, vendors, or other third parties and
    - 3.2.1.2. accepting any gifts from clients, vendors, or other third parties, except for nominal gifts of minimal value (less than \$50).
    - 3.2.1.3. Examples of such gifts include business promotional materials like stationery, t-shirts and other small office use utensils like dairies
  - 3.2.2. **Hospitality:** Employees are prohibited from accepting or offering hospitality from/to clients, vendors, or other third parties, except for reasonable and legitimate business expenses (e.g., meals, travel).
  - 3.2.3. **Gifts and Hospitality from Public Officials or Former Public Officials, Government Officials:** Employees are strictly prohibited from offering or receiving gifts or hospitality from public officials or government officials or their representatives.
  - 3.2.4. **Charitable Donations:** Employees are allowed to participate in charitable activities in their individual capacities

## 4. Reporting and Approval

- 4.1. **Reporting:** Employees must report any gifts or hospitality received to their supervisor or the Compliance Officer.



- 4.2. **Record of Gifts and Hospitality:** BEZA offices in different countries should keep a record of gifts and hospitality in the form of a Register, which gifts have been received or given to employees or to clients.
- 4.3. **Approval:** Employees must obtain approval from their supervisor or the Compliance Officer before offering or receiving gifts or hospitality.

## 5. Consequences of Non-Compliance

Failure to comply with this policy may result in:

- 5.1. **Disciplinary action:** Disciplinary action, up to and including termination.
- 5.2. **Legal action:** Legal action, including fines and penalties.

## 6. Review and Revision

- 6.1. This policy will be reviewed and revised as necessary to ensure compliance with applicable laws and regulations.





## Human Resources Management Policies

<b>Name of the Document</b>	<b>Human Resources Management Policies</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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# 1. Human Resources Management Policy

## 1.1. Purpose and Scope

- 1.1.1. Purpose: To establish a framework for human resources management that supports the company's strategic objectives and promotes a positive work environment.
- 1.1.2. Scope: Applies to all employees, managers, and supervisors within the company.

## 1.2. Human Resources Objectives

- 1.2.1. Attract and Retain Talent: Attract, retain, and develop high-performing employees who share the company's values and vision.
- 1.2.2. Promote a Positive Work Environment: Foster a positive, inclusive, and respectful work environment that promotes employee engagement, well-being, and productivity.
- 1.2.3. Ensure Compliance: Ensure compliance with relevant laws, regulations, and industry standards related to employment, labor, and human rights.

## 1.3. Recruitment and Selection

- 1.3.1. Recruitment Policy: Outline the company's recruitment policy, including advertising, interviewing, and selection procedures.
- 1.3.2. Equal Employment Opportunity: Ensure equal employment opportunities for all applicants, regardless of age, sex, race, disability, or other protected characteristics.
- 1.3.3. Background Checks: Conduct background checks on new employees, as required by law or company policy.

## 1.4. Employee Onboarding (Orientation) and Development

- 1.4.1. Onboarding (orientation) Program: Develop an onboarding program that ensures new employees are properly introduced to the company's policies, procedures, and culture.
- 1.4.2. Training and Development: Provide ongoing training and development opportunities to enhance employee skills, knowledge, and performance.
- 1.4.3. Performance Management: Establish a performance management system that sets clear goals, expectations, and evaluation criteria.

## 1.5. Employee Relations and Communication

- 1.5.1. Employee Communication: Foster open and transparent communication with employees, including regular updates on company performance, policies, and procedures.
- 1.5.2. Employee Feedback: Encourage employee feedback and suggestions and respond promptly to concerns and complaints.
- 1.5.3. Conflict Resolution: Establish a conflict resolution process that ensures fair and timely resolution of disputes.



## **1.6. Employee Benefits and Compensation**

- 1.6.1. Compensation Policy: Outline the company's compensation policy, including salary ranges, bonuses, and benefits.
- 1.6.2. Benefits Program: Develop a benefits program that includes health insurance, retirement plans, and other benefits.
- 1.6.3. Time-Off Policy: Establish a time-off policy that includes vacation, sick leave, and other types of leave.

## **1.7. Health, Safety, and Wellness**

- 1.7.1. Health and Safety Policy: Outline the company's health and safety policy, including procedures for reporting incidents and injuries.
- 1.7.2. Wellness Program: Develop a wellness program that promotes employee health and well-being.
- 1.7.3. Employee Assistance Program: Establish an employee assistance program that provides support for employees dealing with personal or work-related issues.

## **1.8. Diversity, Equity, and Inclusion**

- 1.8.1. Diversity Policy: Outline the company's diversity policy, including procedures for promoting diversity, equity, and inclusion.
- 1.8.2. Inclusive Workplace: Foster an inclusive workplace culture that values diversity and promotes equal opportunities.
- 1.8.3. Unconscious Bias Training: Provide unconscious bias training to employees to promote awareness and understanding.

## **1.9. Termination and Separation**

- 1.9.1. Termination Policy: Outline the company's termination policy, including procedures for terminating employment.
- 1.9.2. Separation Agreement: Establish a separation agreement that outlines the terms and conditions of separation.
- 1.9.3. Outplacement Support: Provide outplacement support to employees who are leaving the company.

## **1.10. Review and Revision**

- 1.10.1. Regular Review: Review of the Human Resources Management Policy regularly to ensure it remains effective and relevant.
- 1.10.2. Revision: Revise the policy as necessary to reflect changes in laws, regulations, or company policies.

# **2. Recruitment Policy**

## **2.1. Purpose and Scope**



2.1.1. **Purpose:** To establish a fair, efficient, and effective recruitment process that attracts and selects the best candidates to support the company's growth and success.

2.1.2. **Scope:** Applies to all recruitment activities, including advertising, interviewing, and hiring for all positions within the company.

## 2.2. Recruitment Objectives

2.2.1. **Attract Top Talent:** Attract highly skilled and motivated candidates who share the company's values and vision.

2.2.2. **Ensure Fairness and Equity:** Ensure that the recruitment process is fair, equitable, and free from bias.

2.2.3. **Reduce Time-to-Hire:** Minimize the time-to-hire to ensure that the company can respond quickly to changing business needs.

2.2.4. **Attracting Qualified Candidates:** Attracting and selecting the best candidates to drive business success.

2.2.5. **Promoting Diversity and Inclusion:** Promoting diversity and inclusion in the workplace, valuing the unique contributions of all employees.

2.2.6. **Ensuring Accountability:** Ensuring that former public officials are held accountable for their actions and decisions while in the office.

## 2.3. Recruitment Policy Statement

2.3.1. BEZA is committed to recruiting and selecting employees based on merit, skills, and qualifications.

2.3.2. BEZA aims to attract and retain the best talent, promoting diversity, equity, and inclusion in the workplace.

2.3.3. BEZA prohibits the recruitment of public officials, either directly or indirectly or in a part-time capacity for BEZA

2.3.4. BEZA will not engage or employ former public officials if it is evident that their employment will compromise BEZA's integrity position i.e., putting BEZA at an unfair industry advantage.

2.3.5. If former public officials are employed, then there should be NO conflict of interest

2.3.6. If the public official is employed by BEZA, with no integrity compromises on the part of BEZA, the public official may not recruit business from his/ her former "influential" organization or position until a "cooling-off" period of 3 years has expired from his/her date of resignation.

## 2.4. Key Principles

2.4.1. **Fairness and Transparency:** We ensure that the recruitment process is fair, transparent, and free from bias.

2.4.2. **Merit-Based Selection:** Selecting candidates based on their skills, qualifications, and experience, rather than their previous public office.



2.4.3. **Compliance with Labour Legislation:** Ensuring that the recruitment policy complies with relevant labour laws and regulations.

## 2.5. Recruitment Process

2.5.1. **Job Analysis:** Conduct a thorough job analysis to determine the key responsibilities, skills, and qualifications required for each position.

2.5.2. **Job Description:** Develop a clear and concise job description that outlines the key responsibilities, skills, and qualifications required for each position.

2.5.3. **Advertising:** Advertise job openings through various channels, including social media, job boards, and professional associations.

2.5.4. **Application and Screening:** Receive and screen applications to ensure that candidates meet the minimum qualifications and requirements.

2.5.5. **Interviewing:** Conduct interviews with shortlisted candidates to assess their skills, experience, and fit with the company culture.

2.5.6. **Reference Checks:** Conduct reference checks to verify the candidate's previous work experience and performance.

2.5.7. **Job Offer:** Extend a job offer to the selected candidate, including details of the compensation package, benefits, and terms of employment.

## 2.6. Employee Due Diligence

2.6.1. BEZA does a thorough due diligence on new employees including former public officials before joining BEZA. The former public official should be considered for employment by BEZA after a cooling off period of 2 years.

2.6.2. **Employee due diligence and screening** refer to the process BEZA uses to assess the background, qualifications, and reliability of a job candidate before they are hired as well as those that have been in the employment of the organization for more than 5 years.

2.6.3. **Employee Due Diligence:** BEZA should engage in verification of identity, review of employment history, educational qualification checks, criminal background checks, financial background checks (especially for roles with financial responsibility), social media and online presence screening and professional licenses or certifications validation. BEZA should also check all employees joining BEZA if they are not classified by AfDB and other Multilateral Development Banks (MDB) to have committed Sanctionable Practices.

2.6.4. **Employee Screening:** is a subset of due diligence and focuses more on standardized checks during the hiring process. BEZA should screen its prospective and employees already in its employment by criminal record check, reference checks, drug testing, right to work or immigration status verification, credit checks (for relevant roles), national and international sanctions.

2.6.5. **Responsibility of Employee Due Diligence:** Head of Human Resources (HR) and Compliance Manager are saddled with the responsibility of employee due diligence. Failure to comply to this role will lead to a disciplinary hearing.



### **2.6.6. Employee Due Diligence Process**

BEZA follows the employee's due diligence process below:

- 2.6.6.1. Initial screening: Conduct an initial review of the candidate's application, resume, and cover letter.
- 2.6.6.2. Verification of information: Verify the accuracy of the information provided by the candidate, including their identity, employment history, and education.
- 2.6.6.3. Background check: Conduct a background check, including a criminal background check, AFDB sanctions and a review of the candidate's credit history.
- 2.6.6.4. Reference checks: Verify the candidate's CV, professional references, including their previous supervisors and colleagues.
- 2.6.6.5. Social media screening: Conduct a social media screening to ensure the candidate's online presence is professional and respectful.
- 2.6.6.6. Final assessment: Conduct a final assessment of the candidate's credibility, reliability, and potential risks and benefits.

### **2.7. Diversity and Inclusion**

- 2.7.1. **Equal Employment Opportunity:** Ensure that the recruitment process is free from bias and discrimination, and that all candidates are given equal opportunity to compete for positions.
- 2.7.2. **Diversity and Inclusion:** Encourage diversity and inclusion by attracting candidates from diverse backgrounds, cultures, and perspectives.

### **2.8. Candidate Experience**

- 2.8.1. **Candidate Communication:** Ensure that candidates receive timely and transparent communication throughout the recruitment process.
- 2.8.2. **Feedback:** Provide feedback to candidates on their application and interview performance.

### **2.9. Recruitment Metrics**

- 2.9.1. **Time-to-Hire:** Track the time-to-hire to ensure that the recruitment process is efficient and effective.
- 2.9.2. **Source of Hire:** Track the source of hire to determine the effectiveness of different recruitment channels.
- 2.9.3. **Diversity Metrics:** Track diversity metrics to ensure that the recruitment process is attracting diverse candidates.

### **2.10. Compliance**

- 2.10.1. **Labor Laws:** Ensure that the recruitment process complies with all relevant labor laws and regulations.
- 2.10.2. **Company Policies:** Ensure that the recruitment process complies with all company policies and procedures.



## **2.11. Implementation of Recruitment policy**

- 2.11.1. **Developing Clear Job Descriptions:** Developing clear job descriptions and person specifications to ensure that candidates are selected based on merit.
- 2.11.2. **Establishing a Fair Selection Process:** Establishing a fair selection process that is free from bias and ensures that the best candidate is selected.
- 2.11.3. **Providing Training and Support:** Providing training and support to employees involved in the recruitment process to ensure that they understand and comply with the policy.

## **2.12. BEZA Responsibilities**

- 2.12.1. **Implementing fair recruitment processes:** Ensuring that all recruitment processes are fair, transparent, and free from bias.
- 2.12.2. **Providing equal opportunities:** Providing equal opportunities for all candidates, regardless of background or characteristics.
- 2.12.3. **Promoting diversity and inclusion:** Promoting diversity and inclusion in the workplace, valuing the unique contributions of all employees.

## **2.13. Review and Revision**

- 2.13.1. **Regular Review:** Review the Recruitment Policy regularly to ensure that it remains effective and relevant.
- 2.13.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company policies.



## 3. A Compensation Policy

### 3.1. Purpose and Scope

- 3.1.1. **Purpose:** To establish a compensation policy that attracts, retains, and motivates top talent in the civil engineering industry.
- 3.1.2. **Scope:** Applies to all employees, including management, former public officials, staff, and hourly workers.

### 3.2. Compensation Objectives

- 3.2.1. **Internal Equity:** Ensure fair and equitable compensation among employees with similar roles, responsibilities, and qualifications.
- 3.2.2. **External Competitiveness:** Offer competitive compensation that reflects industry standards and market rates.
- 3.2.3. **Performance-Based:** Tie compensation to individual and company performance, promoting a culture of meritocracy.

### 3.3. Compensation Policy Statement

- 3.3.1. BEZA is committed to ensuring that the compensation of all employees including **former public officials** is fair, reasonable, and compliant with all applicable laws and regulations.

### 3.4. Compensation Principles

- 3.4.1. **Fairness and Reasonableness:** Compensation will be fair and reasonable, considering the individual's skills, experience, and qualifications.
- 3.4.2. **Compliance with Laws and Regulations:** Compensation will comply with all applicable laws and regulations, including those related to conflict of interest, ethics, and lobbying.
- 3.4.3. **Transparency:** Compensation will be transparent, with clear and concise disclosure of all compensation elements.
- 3.4.4. **Accountability:** Compensation will be subject to regular review and audit to ensure compliance with this policy.

### 3.5. Compensation Structure

- 3.5.1. **Base Salary:** Provide a competitive base salary that reflects industry standards and market rates.
- 3.5.2. **Bonuses:** Offer bonuses based on individual and company performance, such as project completion, safety records, or revenue growth.
- 3.5.3. **Benefits:** Provide a comprehensive benefits package, including health insurance, retirement plans, and paid time off.
- 3.5.4. **Stock Options/Equity:** Consider offering stock options or equity participation to key employees or senior management.



3.6. **Employee Incentives:** To motivate, retain, and boost productivity at BEZA, BEZA offers employees incentives in the following categories.

Monetary Incentives	Non-Monetary Incentives	Tangible Perks
<ul style="list-style-type: none"> <li>• Performance bonuses</li> <li>• Sales commissions</li> <li>• Profit sharing</li> <li>• Stock options or equity grants</li> <li>• Referral bonuses</li> </ul>	<ul style="list-style-type: none"> <li>• Recognition awards (e.g., Employee of the Month)</li> <li>• Extra paid time off or vacation days</li> <li>• Flexible work hours or remote work options</li> <li>• Professional development opportunities (courses, certifications)</li> <li>• Public recognition (e.g., shout-outs in meetings or newsletters)</li> </ul>	<ul style="list-style-type: none"> <li>• Gift cards or vouchers</li> <li>• Company swag or merchandise</li> <li>• Free meals, snacks, or coffee</li> <li>• Wellness programs (e.g., gym memberships, mental health support)</li> <li>• Travel opportunities or retreats</li> </ul>

3.6.1. The procedure for the implementation of these is in Standard Operating Procedures on Human Resources.

### 3.7. Job Evaluation and Grading

3.7.1. Job grading is the process of classifying employee pay into a hierarchy of job grades or bands. This is achieved through a systematic job evaluation process, which establishes the responsibilities, skills, and experience needed for each position.

3.7.2. Job Analysis: Conduct regular job analyses to determine the responsibilities, skills, and qualifications required for each role.

3.7.3. Job Grading: BEZA has established a **Point-factor rating** job grading system that reflects the relative value of each role within the company.

### 3.8. Salary Ranges and Adjustments

3.8.1. Salary Ranges: Establish salary ranges for each job grade, reflecting industry standards and market rates.

3.8.2. Salary Adjustments: Provide salary adjustments based on individual performance, market changes, or internal equity considerations.

### 3.9. Benefits and Perks

3.9.1. **Health Insurance:** Offer comprehensive health insurance coverage, including medical, dental, and vision.

3.9.2. **Retirement Plans:** Provide a retirement plan, or pension plan, to support employees' long-term financial goals.

3.9.3. **Paid Time Off:** Offer paid time off, including vacation days, sick leave, and holidays.



3.9.4. **Professional Development:** Support employees' professional development through training, mentorship, and education assistance.

### 3.10. Performance-Based Compensation

3.10.1. **Performance Evaluations:** Conduct regular performance evaluations to assess individual performance and provide feedback.

3.10.2. **Bonus Structure:** Establish a bonus structure that ties bonuses to individual and company performance.

### 3.11. Compliance and Governance

3.11.1. **Compliance:** BEZA through its compliance office must ensure compliance with all relevant laws and regulations, including tax laws, labor laws, and securities laws.

3.11.2. **Governance:** BEZA has established this policy and the Management Committee (a governance structure) to oversee compensation decisions, ensuring fairness, equity, and transparency.

### 3.12. Policy Compliance

3.12.1. All employees, consultants, and advisors are expected to comply with this policy. Failure to comply may result in disciplinary action, up to and including termination.

### 3.13. Review and Revision

3.13.1. **Regular Review:** Review of the Compensation Policy regularly to ensure it remains effective and relevant.

3.13.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, industry standards, or company objectives.

### 3.14. Acknowledgement

3.14.1. By accepting employment or engagement with BEZA, both former public officials and other new employees, acknowledge that they have read, understood, and will comply with this policy.



## 4. Health and Safety Policy

### 4.1. Purpose and Scope

- 4.1.1. Purpose: To establish a health and safety policy that ensures the well-being of all employees, contractors, and visitors.
- 4.1.2. Scope: Applies to all employees, contractors, and visitors working on company projects, sites, or offices.

### 4.2. Health and Safety Objectives

- 4.2.1. Zero Harm: Achieve zero harm to employees, contractors, and visitors.
- 4.2.2. Compliance: Comply with all relevant health and safety laws, regulations, and industry standards.
- 4.2.3. Continuous Improvement: Continuously improve health and safety performance through regular audits, inspections, and training.

### 4.3. Health and Safety Responsibilities

- 4.3.1. Management: Ensure health and safety policies and procedures are implemented and enforced.
- 4.3.2. Supervisors: Supervise employees and contractors to ensure compliance with health and safety policies and procedures.
- 4.3.3. Safety Officer: To enforce the use of PPEs for staff employed at the site.
- 4.3.4. Employees: Follow health and safety policies and procedures, report hazards, and participate in training.
- 4.3.5. Sub-consultants / Contractors: Comply with company health and safety policies and procedures.

### 4.4. Health and Safety Procedures

- 4.4.1. Risk Assessment: Conduct regular risk assessments to identify hazards and implement controls.
- 4.4.2. Hazard Reporting: Establish a hazard reporting system to encourage employees to report hazards.
- 4.4.3. Incident Reporting: Establish an incident reporting system to investigate and learn from incidents.
- 4.4.4. Emergency Response: Develop and implement emergency response plans for fires, evacuations, and medical emergencies.
- 4.4.5. Training: Provide regular health and safety training for employees and contractors.

### 4.5. Health and Safety Training

- 4.5.1. Induction Training: Provide health and safety induction training for new employees and contractors.



4.5.2. Regular Training: Provide regular health and safety training for employees and sub-consultants.

4.5.3. Specialized Training: Provide specialized training for employees and contractors working with hazardous materials or equipment.

#### **4.6. Health and Safety Monitoring and Review**

4.6.1. Regular Audits: Conduct regular health and safety audits to ensure compliance with policies and procedures.

4.6.2. Inspections: Conduct regular site inspections to identify hazards and implement controls.

4.6.3. Review and Revision: Review and revise the health and safety policy regularly to ensure it remains effective and relevant.

#### **4.7. Employee Participation and Consultation**

4.7.1. Health and Safety Representatives: Appoint health and safety representatives to provide feedback and suggestions.

4.7.2. Employee Consultation: Consult with employees on health and safety matters and provide feedback.

4.7.3. Health and Safety Committee: Establish a health and safety committee to review and discuss health and safety matters.

#### **4.8. Compliance and Governance**

4.8.1. Compliance: Ensure compliance with all relevant health and safety laws, regulations, and industry standards.

4.8.2. Governance: Establish a governance structure that oversees health and safety decisions and ensures accountability.

#### **4.9. Review and Revision**

4.9.1. Regular Review: Review the Health and Safety Policy regularly to ensure it remains effective and relevant.

4.9.2. Revision: Revise the policy as necessary to reflect changes in laws, regulations, industry standards, or company objectives.



## 5. Diversity Policy

### 5.1. Purpose and Scope

- 5.1.1. Purpose: To establish a diversity policy that promotes an inclusive and diverse work environment.
- 5.1.2. Scope: Applies to all employees, contractors, and stakeholders.

### 5.2. Diversity Objectives

- 5.2.1. Inclusive Culture: Foster an inclusive culture that values diversity, promotes equality, and supports the well-being of all employees.
- 5.2.2. Diverse Workforce: Attract, retain, and develop a diverse workforce that reflects the communities we serve.
- 5.2.3. Equal Opportunities: Provide equal opportunities for all employees to contribute, develop, and advance within the company.

### 5.3. Diversity and Inclusion Principles

- 5.3.1. Respect and Dignity: Treat all employees with respect and dignity, regardless of their background, culture, or personal characteristics.
- 5.3.2. Inclusive Communication: Communicate in an inclusive and respectful manner, avoiding language or behavior that may be perceived as discriminatory or exclusionary.
- 5.3.3. Unconscious Bias: Recognize and address unconscious bias in all aspects of employment, including recruitment, selection, and promotion.

### 5.4. Diversity and Inclusion Initiatives

- 5.4.1. Diversity and Inclusion Training: Provide regular training and development programs to promote diversity, inclusion, and cultural awareness.
- 5.4.2. Mentorship Programs: Establish mentorship programs to support the development and advancement of underrepresented groups.
- 5.4.3. Employee Resource Groups: Support employee resource groups to provide a platform for employees to connect, share experiences, and support one another.

### 5.5. Recruitment and Selection

- 5.5.1. Inclusive Recruitment: Ensure that recruitment processes are inclusive and free from bias, using language and imagery that reflects the diversity of the company.
- 5.5.2. Blind Hiring: Implement blind hiring practices to reduce unconscious bias in the selection process.
- 5.5.3. Diverse Interview Panels: Ensure that interview panels are diverse and representative of the company's commitment to inclusion.



## **5.6. Employee Engagement and Retention**

- 5.6.1. Employee Feedback: Regularly solicit feedback from employees to understand their experiences and concerns.
- 5.6.2. Inclusive Workplace: Foster an inclusive workplace culture that promotes employee engagement, well-being, and retention.
- 5.6.3. Recognition and Rewards: Recognize and reward employees who demonstrate inclusive behaviors and contribute to the company's diversity and inclusion objectives.

## **5.7. Accountability and Monitoring**

- 5.7.1. Diversity and Inclusion Metrics: Establish metrics to measure diversity and inclusion, including workforce composition, employee engagement, and retention.
- 5.7.2. Regular Review: Regularly review and assess the effectiveness of diversity and inclusion initiatives.
- 5.7.3. Accountability: Hold managers and employees accountable for promoting diversity, inclusion, and respect in the workplace.

## **5.8. Review and Revision**

- 5.8.1. Regular Review: Review the Diversity Policy regularly to ensure it remains effective and relevant.
- 5.8.2. Revision: Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.



## 6. Termination Policy

### 6.1. Purpose and Scope

- 6.1.1. Purpose: To establish a fair and consistent termination policy that ensures compliance with relevant laws and regulations.
- 6.1.2. Scope: Applies to all employees, including management, staff, and hourly workers.

### 6.2. Termination Types

- 6.2.1. Voluntary Termination: Employee-initiated termination, including resignation or retirement.
- 6.2.2. Involuntary Termination: Employer-initiated termination, including layoffs, downsizing, or termination for cause.
- 6.2.3. Constructive Dismissal: Termination due to a fundamental breach of contract or working conditions.

### 6.3. Termination Procedures

- 6.3.1. Notice Period: A minimum notice period of [1] weeks for non-management employees, 1 month notice period for supervisors to Management staff, as per company policy or employment contract.
- 6.3.2. Termination Meeting: Conduct a termination meeting with the employee to discuss the reasons for termination, notice period, and any necessary next steps.
- 6.3.3. Termination Letter: Provide a formal termination letter outlining the terms of termination, including notice period, severance package (if applicable), and any outstanding benefits or entitlements.

### 6.4. Termination for Cause

- 6.4.1. Gross Misconduct: Terminate an employee for gross misconduct, including theft, harassment, or serious breaches of company policies.
- 6.4.2. Poor Performance: Terminate an employee for poor performance, after providing adequate warnings and opportunities for improvement.

### 6.5. Severance Package

- 6.5.1. Eligibility: Determine eligibility for a severance package, based on company policy, employment contract, or relevant laws and regulations.
- 6.5.2. Severance Pay: Provide severance pay, calculated based on [X] weeks/months of salary, as per company policy or employment contract.
- 6.5.3. Continuation of Benefits: Continue benefits, such as health insurance or pension plans, for a specified period.



**6.6. Post-Termination Obligations**

- 6.6.1. Confidentiality: Ensure the employee maintains confidentiality regarding company information and trade secrets.
- 6.6.2. Return of Company Property: Ensure the employee returns all company property, including equipment, documents, and keys.
- 6.6.3. Non-Compete Clause: Enforce any non-compete clauses, as per the employment contract or company policy.

**6.7. Review and Revision**

- 6.7.1. Regular Review: Review the Termination Policy regularly to ensure it remains effective and compliant with relevant laws and regulations.
- 6.7.2. Revision: Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.



## 7. Disciplinary Hearing Policy

### 7.1. Purpose and Scope

- 7.1.1. **Purpose:** To establish a fair and transparent process for conducting disciplinary hearings.
- 7.1.2. **Scope:** Applies to all employees, including management, staff, and hourly workers.

### 7.2. Policy Principles

- 7.2.1. **Fairness:** Ensure that disciplinary hearings are conducted in a fair and impartial manner and unbiased.
- 7.2.2. **Transparency:** Provide clear and transparent procedures for disciplinary hearings.
- 7.2.3. **Consistency:** Ensure that disciplinary actions are consistent with company policies. Applying disciplinary procedures consistently and fairly to all employees.
- 7.2.4. **Respect:** Treating employees with respect and dignity during disciplinary hearings.
- 7.2.5. **Confidentiality:** Maintaining confidentiality throughout the disciplinary process.

### 7.3. Disciplinary Hearing Policy Statement

- 7.3.1. BEZA is committed to maintaining a fair and respectful work environment.
- 7.3.2. This Disciplinary Hearing Policy outlines the procedures for addressing misconduct, poor performance, or other issues that may require disciplinary action.
- 7.3.3. Any employee, director or former public employee who commits AfDB Group's **Sanctionable Practice(s)** which includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice, will be called for Disciplinary hearing which can lead to dismissal.

### 7.4. Disciplinary Hearing Process (Procedures)

- 7.4.1. **Notification:** Notify the employee in writing of the alleged misconduct and the date, time, and location of the disciplinary hearing.
- 7.4.2. **Pre-Hearing:** Provide the employee with an opportunity to review the evidence and prepare their defense.
- 7.4.3. **Hearing:** Conduct the disciplinary hearing in a fair and impartial manner, allowing the employee to present their case.
- 7.4.4. **Decision:** Make a decision based on the evidence presented and notify the employee in writing of the outcome.

### 7.5. Disciplinary Actions

- 7.5.1. Verbal Warning: A verbal warning for minor misconduct.
- 7.5.2. Written Warning: A written warning for more serious misconduct.
- 7.5.3. Suspension: Suspension without pay for serious misconduct.
- 7.5.4. Termination: Termination of employment for gross misconduct like bribery and/or any form of fraud.



## 7.6. Employee Rights

- 7.6.1. **Be informed:** Be informed of the allegations and the potential disciplinary action.
- 7.6.2. **Right to Representation:** The right to be represented by a union representative or colleague during the disciplinary hearing.
- 7.6.3. **Respond:** Respond to the allegations and provide evidence.
- 7.6.4. **Appeal:** Appeal the decision made during the disciplinary hearing to a higher authority.

## 7.7. Record Keeping

- 7.7.1. **Accurate Records:** Keep accurate records of disciplinary hearings and actions.
- 7.7.2. **Confidentiality:** Maintain confidentiality of disciplinary records.

## 7.8. Accountability

- 7.8.1. **Accountability:** Hold managers and supervisors accountable for conducting disciplinary hearings in a fair and transparent manner.
- 7.8.2. **Training:** Provide training for managers and supervisors on the Disciplinary Hearing Policy and procedures.

## 7.9. Responsibilities

- 7.9.1. **Management:** The Management Committee, through the Head of HR, are responsible for conducting investigations, notifying employees, and conducting disciplinary hearings.
- 7.9.2. **Employees:** Responsible for cooperating with investigations, attending disciplinary hearings, and complying with disciplinary decisions.

## 7.10. Review and Revision

- 7.10.1. **Regular Review:** Review the Disciplinary Hearing Policy regularly to ensure it remains effective and relevant.
- 7.10.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company policies.



## 8. Outstanding employee performance recognition Policy

### 8.1. Purpose

- 8.1.1. **Recognize and reward outstanding employee performance** to motivate and inspire employees, promote a positive work culture, and reinforce company values.
- 8.1.2. **Encourage excellence:** Encourage employees to strive for excellence in their work.
- 8.1.3. **Boost morale:** Boost employee morale and motivation.
- 8.1.4. **Retain talent:** Retain top talent and reduce turnover.

### 8.2. Policy Statement

- 8.2.1. BEZA is committed to recognizing and rewarding outstanding employee performance.
- 8.2.2. This policy outlines the principles and procedures for recognizing and rewarding employees who demonstrate exceptional performance, dedication, and commitment to the company's mission and values.

### 8.3. Policy Principles

- 8.3.1. **Fairness:** Ensuring that recognition and rewards are fair and unbiased.
- 8.3.2. **Transparency:** Clearly communicating the criteria and process for recognition and rewards.
- 8.3.3. **Consistency:** Consistently applying the recognition and reward process.
- 8.3.4. **Timeliness:** Recognizing and rewarding employees in a timely manner.

### 8.4. Criteria for Recognition

- 8.4.1. **Exceptional Performance:** Consistently exceed performance expectations, demonstrating exceptional skills, knowledge, and dedication.
- 8.4.2. **Innovative Solutions:** Develop and implement innovative solutions that improve processes, reduce costs, or enhance customer satisfaction.
- 8.4.3. **Leadership and Mentorship:** Demonstrate leadership and mentorship skills, guiding and supporting colleagues to achieve their goals.
- 8.4.4. **Teamwork and Collaboration:** Foster a culture of teamwork and collaboration, working effectively with colleagues to achieve shared objectives.
- 8.4.5. **Customer Satisfaction:** Consistently receive positive feedback from customers, demonstrating a commitment to delivering exceptional service.

### 8.5. Recognition and Reward Programs

- 8.5.1. Employee of the Month/Quarter/Year: Recognize outstanding employees with a designated parking spot, trophy, or certificate.
- 8.5.2. Bonus or Reward: Offer a one-time bonus or reward, such as a gift card or extra time off.
- 8.5.3. Promotion or Title Change: Consider promoting or changing the title of outstanding employees to reflect their growing responsibilities and contributions.



8.5.4. Professional Development Opportunities: Provide opportunities for outstanding employees to attend conferences, training sessions, or workshops to enhance their skills and knowledge.

8.5.5. Public Recognition: Recognize outstanding employees through company-wide announcements, social media, or local media outlets.

#### **8.6. Nomination and Selection Process**

8.6.1. Nomination Form: Create a nomination form for employees to submit nominations for outstanding performance.

8.6.2. Selection Committee: Establish a selection committee to review nominations and select recipients.

8.6.3. Criteria-Based Evaluation: Evaluate nominations based on the established criteria for recognition.

#### **8.7. Communication with Employees**

8.7.1. *Company-wide announcements*: Announcements and celebrations.

8.7.2. *Personalized notifications*: Personalized notifications and recognition from supervisors and colleagues.

#### **8.8. Presentation and Celebration**

8.8.1. Award Ceremony: Host an award ceremony to present recognition awards and celebrate outstanding employee performance.

8.8.2. Personalized Certificate: Present a personalized certificate to recognize the employee's outstanding performance.

8.8.3. Celebratory Lunch or Dinner: Host a celebratory lunch or dinner to honor the recognized employee.

#### **8.9. Ongoing Recognition**

8.9.1. Regular Feedback: Provide regular feedback and coaching to outstanding employees to continue motivating and inspiring them.

8.9.2. Career Development Planning: Develop a career development plan with outstanding employees to support their ongoing growth and development.

8.9.3. Leadership Opportunities: Provide leadership opportunities for outstanding employees to continue challenging and developing them.

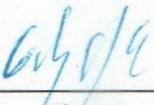
#### **8.10. Review and Revision**

8.10.1. This policy will be reviewed and revised annually, or as necessary, to ensure it remains effective and relevant.





## Information and Communication Technology (ICT) Policy

Name of the Document	Information and Communication Technology (ICT) Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



## 1. Purpose and Scope

- 1.1. Purpose: Establish a policy for the use of ICT resources to ensure the security, integrity, and reliability of company data and systems.
- 1.2. Scope: Applies to all employees, sub-consultants, and third-party vendors who use company ICT resources.

## 2. Definitions

- 2.1. ICT Resources: Includes all company-owned or leased computer hardware, software, networks, and telecommunications equipment.
- 2.2. Company Data: Includes all electronic data created, received, or stored by the company.

## 3. ICT Objectives

- 3.1. Security: Ensure the security and integrity of company data and systems.
- 3.2. Reliability: Ensure the reliability and availability of ICT resources.
- 3.3. Compliance: Ensure compliance with relevant laws, regulations, and industry standards.

## 4. ICT Responsibilities

- 4.1. ICT Manager: Responsible for the overall management and maintenance of ICT resources.
- 4.2. Employees: Responsible for using ICT resources in accordance with this policy.
- 4.3. Contractors and Third-Party Vendors: Responsible for using ICT resources in accordance with this policy and any relevant contractual agreements.

## 5. ICT Security

- 5.1. Access Controls: Establish access controls to ensure that only authorized personnel can access company data and systems.
- 5.2. Password Policy: Establish a password policy to ensure the security of company data and systems.
- 5.3. Firewalls and Antivirus Software: Install and maintain firewalls and antivirus software to protect company data and systems.
- 5.4. Data Backup and Recovery: Establish a data backup and recovery process to ensure the availability of company data.

## 6. ICT Usage

- 6.1. Personal Use: Employees are permitted to use company ICT resources for personal use, subject to certain restrictions like national laws, privacy violations.



- 6.2. Internet and Email Use: Establish guidelines for the use of the internet and email (see ICT Standard Operating Procedures).
- 6.3. Software and Hardware Use: Establish guidelines for the use of company software and hardware.

## 7. ICT Monitoring and Auditing

- 7.1. Monitoring: Monitor ICT resources to detect and prevent security breaches.
- 7.2. Auditing: Conduct regular audits to ensure compliance with this policy.

## 8. ICT Incident Response

- 8.1. Incident Response Plan: Establish an incident response plan to respond to ICT security incidents.
- 8.2. Reporting Incidents: Report all ICT security incidents to the ICT Manager.

## 9. Compliance and Governance

- 9.1. Compliance: Ensure compliance with relevant laws, regulations, and industry standards.
- 9.2. Governance: Establish a governance structure to oversee ICT resources.

## 10. Review and Revision

- 10.1. Regular Review: Regularly review this policy to ensure it remains effective and relevant.
- 10.2. Revision: Revise this policy as necessary to reflect changes in laws, regulations, or company objectives.



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## 1. Purpose and Scope

- 1.1. **Purpose:** To establish a framework for internal controls that supports BEZA's business objectives, ensures compliance with applicable laws and regulations, and provides reasonable assurance regarding the achievement of our objectives.
- 1.2. **Scope:** Applies to all employees, management, and stakeholders involved in financial and operational activities.

## 2. Internal Control Objectives

- 2.1. **Reliability of Financial Reporting:** Ensure the accuracy, completeness, and validity of financial data.
- 2.2. **Effectiveness and Efficiency of Operations:** Ensure that operations are carried out in an efficient and effective manner.
- 2.3. **Compliance with Laws and Regulations:** Ensure compliance with relevant laws, regulations, and industry standards.
- 2.4. **Safeguarding of Assets:** Protect company assets from unauthorized use, theft, or damage.

## 3. Policy Statement

We are committed to maintaining a strong internal control environment that includes:

- 3.1. **Control Environment:** A culture that emphasizes the importance of internal controls, ethics, and compliance from the Board of Directors to the operational staff.
- 3.2. **Risk Assessment:** An ongoing process to identify, assess, and manage risks that could impact on our objectives.
- 3.3. **Control Activities:** Policies, procedures, and controls that ensure the accuracy, reliability, and integrity of our financial reporting and operational processes.
- 3.4. **Information and Communication:** Systems and processes that ensure the timely and accurate flow of information to support decision-making and internal control.
- 3.5. **Monitoring Activities:** Ongoing monitoring and review of our internal controls to ensure their effectiveness and identify areas for improvement.

## 4. Internal Control Components

- 4.1. **Control Environment:** Establish a culture of internal control, with clear policies, procedures, and accountability.
- 4.2. **Risk Assessment:** Identify, assess, and manage risks that could impact financial and operational information.



- 4.3. **Control Activities:** Implement control activities, such as authorization, approval, and reconciliation, to ensure accurate and reliable financial and operational information.
- 4.4. **Information and Communication:** Ensure that financial and operational information is accurate, complete, and communicated to relevant stakeholders.
- 4.5. **Monitoring Activities:** Monitor internal controls to ensure they are operating effectively and efficiently.

## 5. Internal Control Procedures

- 5.1. **Financial Transactions:** BEZA has established procedures for financial transactions, including authorization, approval, and reconciliation. Refer to Standard Operating Procedures for detailed procedures and the approval levels and authority. Please refer to the Approval Authority and limits under section 11: Appendix below.
- 5.2. **Accounting and Financial Reporting:** Establish procedures for accounting and financial reporting, including journal entries, account reconciliations, and financial statement preparation.
- 5.3. **Asset Management:** Establish procedures for asset management, including inventory management, asset tracking, and disposal.
- 5.4. **Information Technology:** Establish procedures for information technology, including access controls, data backup, and disaster recovery.

## 6. Roles and Responsibilities

- 6.1. **Management:** Ensure that internal controls are established, implemented, and maintained.
- 6.2. **Employees:** Adhere to internal control procedures and report any control weaknesses or incidents.
- 6.3. **Internal Audit:** Conduct regular audits to ensure internal controls are operating effectively and efficiently.

## 7. Monitoring and Review

- 7.1. **Regular Review:** Review internal controls regularly to ensure they remain effective and efficient.
- 7.2. **Control Self-Assessment:** Conduct regular control self-assessments to identify control weaknesses and implement corrective actions.
- 7.3. **Internal Audit Reports:** Review internal audit reports to identify control weaknesses and implement corrective actions.



## 8. Compliance, Reporting and Governance

- 8.1. **Compliance:** Ensure compliance with relevant laws, regulations, and industry standards.
- 8.2. **Reporting:** All employees are expected to comply with this policy and report any concerns or violations of Internal controls to management or internal audit.
- 8.3. **Governance:** Establish a governance structure to oversee internal controls and ensure accountability.

## 9. Training and Awareness

- 9.1. **Training:** Provide regular training on internal controls, including procedures and responsibilities.
- 9.2. **Awareness:** Promote awareness of internal controls among all employees and stakeholders.

## 10. Review and Revision

- 10.1. **Regular Review:** Review the Internal Control Policy regularly to ensure it remains effective and relevant.
- 10.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.

## 11. Appendix

### Authorization (Initial Approval)

- **Who Authorizes?**
  - Department Heads / Project Managers / Procurement Officers authorize transactions **within their spending limits**.
  - Ensures the request is **valid** and **within budget** before moving to the next step.

### Authorization & Approval

- **Purpose:** Obtain approval based on financial authority limits.
- **Key Concepts:**
  - **Segregation of Duties:** Different people should initiate, authorize, and process.
  - **Delegation of Authority Matrix:** The following table defines who can approve based on amount and nature.

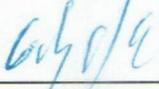


Transaction Type	Threshold	Approver
Routine Payments	Up to \$5,000	Department Head/ Country Director? Project Manager
Capital Expenditure Purchases	\$5,001 - \$50,000	Managing Director
> \$50,000	Board Chairperson	
Journal Entries	Any	Senior Accountant/Controller
Payroll	Any	HR & CFO & Managing Director
Petty Cash	≤ \$500	Finance Officer





## Internal Control Policy

<b>Name of the Document</b>	<b>Internal Control Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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- 3.4. **Information and Communication:** Systems and processes that ensure the timely and accurate flow of information to support decision-making and internal control.
- 3.5. **Monitoring Activities:** Ongoing monitoring and review of our internal controls to ensure their effectiveness and identify areas for improvement.

## 4. Internal Control Components

- 4.1. **Control Environment:** Establish a culture of internal control, with clear policies, procedures, and accountability.
- 4.2. **Risk Assessment:** Identify, assess, and manage risks that could impact financial and operational information.



- 4.3. **Control Activities:** Implement control activities, such as authorization, approval, and reconciliation, to ensure accurate and reliable financial and operational information.
- 4.4. **Information and Communication:** Ensure that financial and operational information is accurate, complete, and communicated to relevant stakeholders.
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- 5.3. **Asset Management:** Establish procedures for asset management, including inventory management, asset tracking, and disposal.
- 5.4. **Information Technology:** Establish procedures for information technology, including access controls, data backup, and disaster recovery.

## 6. Roles and Responsibilities

- 6.1. **Management:** Ensure that internal controls are established, implemented, and maintained.
- 6.2. **Employees:** Adhere to internal control procedures and report any control weaknesses or incidents.
- 6.3. **Internal Audit:** Conduct regular audits to ensure internal controls are operating effectively and efficiently.

## 7. Monitoring and Review

- 7.1. **Regular Review:** Review internal controls regularly to ensure they remain effective and efficient.
- 7.2. **Control Self-Assessment:** Conduct regular control self-assessments to identify control weaknesses and implement corrective actions.
- 7.3. **Internal Audit Reports:** Review internal audit reports to identify control weaknesses and implement corrective actions.



## 8. Compliance, Reporting and Governance

- 8.1. **Compliance:** Ensure compliance with relevant laws, regulations, and industry standards.
- 8.2. **Reporting:** All employees are expected to comply with this policy and report any concerns or violations of Internal controls to management or internal audit.
- 8.3. **Governance:** Establish a governance structure to oversee internal controls and ensure accountability.

## 9. Training and Awareness

- 9.1. **Training:** Provide regular training on internal controls, including procedures and responsibilities.
- 9.2. **Awareness:** Promote awareness of internal controls among all employees and stakeholders.

## 10. Review and Revision

- 10.1. **Regular Review:** Review the Internal Control Policy regularly to ensure it remains effective and relevant.
- 10.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.

## 11. Appendix

### Authorization (Initial Approval)

- **Who Authorizes?**
  - Department Heads / Project Managers / Procurement Officers authorize transactions **within their spending limits**.
  - Ensures the request is **valid** and **within budget** before moving to the next step.

### Authorization & Approval

- **Purpose:** Obtain approval based on financial authority limits.
- **Key Concepts:**
  - **Segregation of Duties:** Different people should initiate, authorize, and process.
  - **Delegation of Authority Matrix:** The following table defines who can approve based on amount and nature.



Transaction Type	Threshold	Approver
Routine Payments	Up to \$5,000	Department Head/ Country Director? Project Manager
Capital Expenditure Purchases	\$5,001 - \$50,000	Managing Director
> \$50,000	Board Chairperson	
Journal Entries	Any	Senior Accountant/Controller
Payroll	Any	HR & CFO & Managing Director
Petty Cash	≤ \$500	Finance Officer





## Procurement Policy

<b>Name of the Document</b>	<b>Procurement Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** Establish a procurement policy to ensure fair, transparent, and cost-effective purchasing practices.
- 1.2. **Scope:** Applies to all employees, management, and stakeholders involved in procurement activities.
  - 1.2.1. **Procurement of Goods and Services:** Beza will procure goods and services under this policy

## 2. Procurement Policy Objectives

- 2.1. The objectives of this procurement policy are to:
  - 2.1.1. Ensure compliance with relevant laws, regulations, and industry standards.
  - 2.1.2. Promote fair competition and transparency in the procurement process.
  - 2.1.3. Achieve value for money in the procurement of goods and services.
  - 2.1.4. Minimize risks and ensure that procurement activities are conducted in a responsible and sustainable manner.

## 3. Procurement Policy Statement

- 3.1. BEZA is committed to conducting its procurement activities in a fair, transparent, and sustainable manner.
- 3.2. This policy statement outlines our commitment to responsible procurement practices.
- 3.3. **Our Commitment:** BEZA commits to:
  - 3.3.1. **Complying with laws and regulations:** We will comply with all applicable laws, regulations, and industry standards related to procurement.
  - 3.3.2. **Promoting fair competition:** We will promote fair competition among suppliers and treat all suppliers equally and without bias.
  - 3.3.3. **Achieving value for money:** We will strive to achieve value for money in our procurement activities, considering factors such as price, quality, and sustainability.
  - 3.3.4. **Supporting sustainable procurement:** We will consider the environmental, social, and economic impacts of our procurement decisions and strive to minimize harm.
  - 3.3.5. **Maintaining transparency and accountability:** We will maintain transparent and accountable procurement processes, including clear documentation and audit trails.



## 4. Procurement Principles

- 4.1. BEZA will adhere to the following procurement principles:
- 4.1.1. **Transparency:** We will provide clear and concise information about our procurement processes and requirements.
  - 4.1.2. **Fairness:** We will treat all suppliers and contractors equally and without bias.
  - 4.1.3. **Competition:** We will promote competition among suppliers to achieve value for money.
  - 4.1.4. **Sustainability:** We will consider the environmental, social, and economic impacts of our procurement decisions.
  - 4.1.5. **Accountability:** We will maintain transparent and accountable procurement processes.
  - 4.1.6. **Value for Money:** Achieve value for money in all procurement activities.
  - 4.1.7. **Compliance:** Comply with relevant laws, regulations, and industry standards.

## 5. Procurement Procedures

- 5.1. **Needs Assessment:** Conduct needs assessment to determine the requirements for goods, services, or works.
- 5.2. **Supplier Selection:** Select suppliers or contractors based on established criteria, including experience, qualifications, and pricing. In supplier selection, BEZA should critically conduct due diligence to the potential supplier to ensure that the supplier/contractor is free from sanctions and of moral good standing. This due diligence should include criticality and risk assessments, to minimize BEZA assuming avoidable risk coming through suppliers engagements.
- 5.3. **Tendering:** Conduct tendering processes for significant procurements, ensuring transparency and fairness.
- 5.4. **Quotations:** Quotations will be sought for procurements below the tender threshold.
- 5.5. **Negotiation:** Negotiations will be conducted with suppliers to achieve the best value for money.
- 5.6. **Contract Award:** Contracts will be awarded to the supplier that offers the best value for money.
- 5.7. **Contract Management:** Establish and manage contracts with suppliers or contractors, ensuring compliance with terms and conditions.

## 6. Procurement Methods

- 6.1. **Direct Purchase:** Use direct purchase methods for low-value or routine procurements.
- 6.2. **Tendering:** Use tendering methods for significant or complex procurements.



- 6.3. **Negotiation:** Use negotiation methods for procurements requiring specialized expertise or innovative solutions.

## 7. Contract Management

- 7.1. Contracts will be managed in accordance with the following principles:
- 7.1.1. **Contract Administration:** Contracts will be administered in accordance with the terms and conditions of the same contracts.
  - 7.1.2. **Performance Monitoring:** Supplier performance will be monitored and evaluated.
  - 7.1.3. **Contract Variation:** Contract variations will be managed in accordance with the contract terms and conditions.

## 8. Procurement Records

- 8.1. **Record Keeping:** Procurement records should be kept for a minimum of 15 years.
- 8.2. **Documentation:** Procurement documentation should be complete and accurate. The procurement committee outlined in sub-section 9.1.1 will enforce this duty through the Head of Finance.
- 8.3. **Accessibility:** Procurement records will be accessible to authorized personnel.

## 9. Roles and Responsibilities

### 9.1. BEZA's Responsibilities

- 9.1.1. **Procurement Committee:** This management committee will authorise procurement above a given threshold. The General Manager and the Heads of Finance and Technical Manager will oversee the procurement processes.
- 9.1.2. **Implementing this policy:** We will implement this policy and ensure that all procurement activities comply with its principles and requirements.
- 9.1.3. **Monitoring and reviewing:** We will regularly monitor and review our procurement activities to ensure compliance with this policy.
- 9.1.4. **Providing training and support:** We will provide training and support to employees involved in procurement activities to ensure they understand and comply with this policy.

### 9.2. Our Suppliers' Responsibilities

- 9.2.1. **Complying with laws and regulations:** Suppliers must comply with all applicable laws, regulations, and industry standards related to procurement.
- 9.2.2. **Providing accurate information:** Suppliers must provide accurate and complete information about their goods and services.
- 9.2.3. **Meeting our requirements:** Suppliers must meet our requirements and specifications for goods and services.



## 10. Supplier Management

- 10.1. **Supplier Registration:** Establish a supplier registration process to ensure qualified and reliable suppliers.
- 10.2. **Supplier Evaluation:** Evaluate suppliers based on performance, quality, integrity and reliability.
- 10.3. **Supplier Development:** Develop and implement programs to improve supplier performance and capacity.
- 10.4. **Integrity Compliance Program (ICP):** From the inception of the supplier contract, the compliance manager should inform the suppliers about Integrity Compliance Program and the supplier should sign as acknowledgement of ICP. Failure to comply with the ICP will lead to supplier contract being terminated.

## 11. Conflict of Interest

- 11.1. **Declaration of Interest:** Require employees to declare any conflicts of interest related to procurement activities.
- 11.2. **Gifts and Hospitality:** Establish guidelines for gifts and hospitality related to procurement activities.

## 12. Audit and Compliance

- 12.1. **Internal Audit:** Conduct regular internal audits to ensure compliance with procurement policies and procedures. This will be done by the Internal audit unit and the compliance unit of BEZA.
- 12.2. **External Audit:** Conduct external audits as required by law or regulation.
- 12.3. **Compliance:** Ensure compliance with relevant laws, regulations, and industry standards.

## 13. Review and Revision

- 13.1. **Regular Review:** Review the Procurement Policy regularly to ensure it remains effective and relevant.
- 13.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.

## 14. Training and Awareness

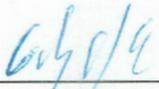
- 14.1. **Training:** Provide regular training on procurement policies and procedures.
- 14.2. **Awareness:** Promote awareness of the Procurement Policy among all employees and stakeholders.







## BCE Projects Contracting Policy

<b>Name of the Document</b>	<b>Projects Contracting Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 Signature	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



## 1. Purpose and Scope

- 1.1. **Purpose:** Establish a policy for project contracting to ensure that all contracts are properly managed, executed, and administered.
- 1.2. **Scope:** Applies to all projects, contracts, and agreements entered by the company.

## 2. Contracting Principles

- 2.1. **Fairness:** Ensure that all contracts are fair, reasonable, and transparent.
- 2.2. **Compliance:** Comply with all relevant laws, regulations, and industry standards.
- 2.3. **Risk Management:** Identify, assess, and manage risks associated with contracts.

## 3. Contract Types

- 3.1. **Lump Sum Contracts:** Define scope, price, and payment terms.
- 3.2. **Supervision Contracts:** Define scope, price, and payment terms.
- 3.3. **Percentage-based contract:**
- 3.4. **Retainer agreement:**

## 4. Contract Administration

- 4.1. BEZA employees who are authorized to contract on behalf of BEZA should follow the following procedures in contract administration:
  - 4.1.1. **Contract Review:** Review of all contracts before execution.
  - 4.1.2. **Contract Approval:** Obtain approval from authorized personnel (Managing Director, Country Director, Board Chairperson) before executing contracts.
  - 4.1.3. **Contract Management:** Assign a contract manager to administer each contract, in compliance with the relevant laws and regulations of the host country.
  - 4.1.4. **Contract Amendments:** Document and approval of all contract amendments.

## 5. Contract Risk Management

- 5.1. **Risk Identification:** Identify potential risks associated with each contract.
- 5.2. **Risk Assessment:** Assess the likelihood and impact of each identified risk.
- 5.3. **Risk Mitigation:** Develop and implement strategies to mitigate identified risks.

## 6. Contract Dispute Resolution

- 6.1. **Dispute Resolution Process:** Establish a process for resolving disputes arising from contracts. See Standard Operating Procedure.



- 6.2. **Mediation:** Use mediation to resolve disputes before proceeding to arbitration or litigation.
- 6.3. **Arbitration:** Use arbitration to resolve disputes, if necessary.

## 7. Contract Close-Out

- 7.1. **Contract Completion:** Verify that all contract requirements have been fulfilled.
- 7.2. **Contract Documentation:** Document all contract activities, including amendments and disputes. Prepare contract completion report, certify final payment, endorse built drawings
- 7.3. **Contract Review:** Conduct a post-contract review to identify lessons learned.

## 8. Compliance and Governance

- 8.1. **Compliance:** Ensure contracts include obligation to comply with all relevant laws, regulations, and industry standards.
- 8.2. **Governance:** Establish a governance structure to oversee contract management.

## 9. Roles and Responsibilities

BEZA has a Projects contracts committee, composed of the General Manager and two other senior engineers.

- 9.1. **Projects contracting committee is** responsible for:

**9.1.1. Contract Review and Approval**

- 9.1.1.1. Review and approve contract documents, including terms and conditions, scope of work, and payment terms.
- 9.1.1.2. Ensure that contracts align with company policies and procedures.

**9.1.2. Contract Negotiation**

- 9.1.2.1. Negotiate contract terms and conditions with clients and sub-consultancy.
- 9.1.2.2. Ensure that negotiated terms are fair, reasonable, and in the best interest of the company.

**9.1.3. Risk Management**

- 9.1.3.1. Identify and assess potential risks associated with contracts.
- 9.1.3.2. Develop and implement risk mitigation strategies.

**9.1.4. Contract Administration**

- 9.1.4.1. Ensure that contracts are properly administered, including notice requirements, payment terms, and dispute resolution procedures.
- 9.1.4.2. Monitor contract performance and ensure compliance with contractual obligations.

**9.1.5. Dispute Resolution**

- 9.1.5.1. Manage and resolve disputes arising from contracts.





## 11. Review and Revision

- 11.1. **Regular Review:** Review the contract policy regularly to ensure it remains effective and relevant.
- 11.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company objectives.





**CONTRACT PRICE**

The total contract price for the services shall be \$[CONTRACT PRICE].

**PAYMENT TERMS**

The Owner shall pay the Contractor as follows:

- 1. [PERCENTAGE]% of the contract price upon execution of this Agreement
- 2. [PERCENTAGE]% of the contract price upon completion of [MILESTONE]
- 3. [PERCENTAGE]% of the contract price upon completion of [MILESTONE]
- 4. The balance of the contract price upon completion of the project

**PROJECT SCHEDULE**

The project shall commence on [START DATE] and shall be completed on [COMPLETION DATE].

**WARRANTIES AND REPRESENTATIONS**

The Sub-Consultant warrants and represents that:

- 1. The services will be performed in a professional and workmanlike manner
- 2. The services will comply with all applicable laws and regulations
- 3. The services will not infringe on any third-party rights

**INDEMNIFICATION**

The Consultant shall indemnify and hold harmless the Owner against any claims, damages, and expenses arising from:

- 1. The Contractor's breach of this Agreement
- 2. The Contractor's negligence or willful misconduct
- 3. Any defect or deficiency in the services

**COMPLIANCE CLAUSE**

The consultants shall comply with all applicable laws and regulations, ethics and not infringe in any way any of the sanctionable practices (corrupt, fraudulent, collusive, coercive, or obstructive practices)

**TERMINATION**



Either party may terminate this Agreement upon [NUMBER] days' written notice to the other party.

**GOVERNING LAW**

This Agreement shall be governed by and construed in accordance with the laws of [STATE/PROVINCE].

**DISPUTE RESOLUTION**

Any disputes arising from this Agreement shall be resolved through [DISPUTE RESOLUTION PROCESS].

By signing below, the parties acknowledge that they have read, understand, and agree to the terms and conditions of this Agreement.

**BEZA General Manager**

Signature: \_\_\_\_\_

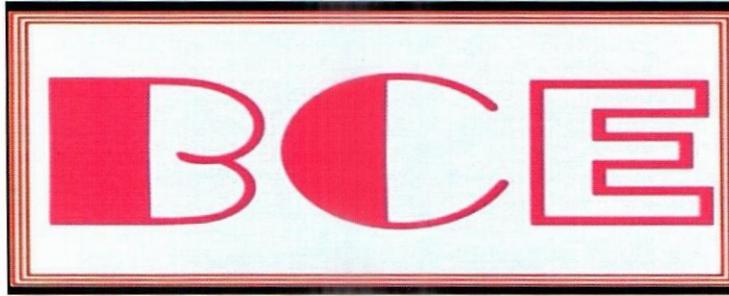
Date: \_\_\_\_\_

**SUBCONSULTANT**

Signature: \_\_\_\_\_

Date: \_\_\_\_\_





## Project Management Policy

Name of the Document	Project Management Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 _____ Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. The **Purpose** of this Policy is to:
  - 1.1.1. **Ensure project success:** Ensure that all projects are delivered on time, within budget, and to the required quality standards.
  - 1.1.2. **Meet client expectations:** Meet our clients' expectations and needs through effective project management.
  - 1.1.3. **Promote continuous improvement:** Promote continuous improvement in our project management processes and practices, to enhance project management maturity level in BEZA.
- 1.2. **Scope:** This policy applies to all projects undertaken by BEZA, including:
  - 1.2.1. **Design projects:** Design projects, including architectural, engineering, and other design services.
  - 1.2.2. **Supervising Construction projects:** Construction projects, including building, Highways, dams, water works, other civil engineering works engineering, and other construction services.
  - 1.2.3. **Other Consulting projects:** Consulting projects, including project management, construction project management, EIA, feasibility study and others.
- 1.3. This policy applies to all employees, sub-consultants, and stakeholders involved in the project management process.

## 2. Policy Statement

- 2.1. BEZA is committed to delivering high-quality projects that meet our clients' needs and expectations.
- 2.2. This policy outlines our approach to project management, including designs, supervision, and contract administration.
- 2.3. Our company is committed to delivering high-quality civil engineering projects that meet our clients' expectations and requirements.
- 2.4. We will ensure that all projects are managed efficiently, effectively, and safely, in accordance with the industry's best practices and regulatory requirements.

## 3. Projects undertaken by BEZA

### 3.1. Designs

- 3.1.1. Design standards: All designs shall meet the relevant industry standards and regulations.
- 3.1.2. Design review: All designs shall be reviewed and approved by the relevant authorities before commencement of construction.
- 3.1.3. Design documentation: All design documentation shall be accurate, complete, and up-to-date.



### **3.2. Supervision**

- 3.2.1. Site supervision: All construction sites should be supervised by a qualified site manager or supervisor.
- 3.2.2. Quality control: All work shall be inspected and tested to ensure compliance with the design specifications and industry standards.
- 3.2.3. Safety management: All sites shall have a safety management plan in place, which shall be reviewed and updated regularly.
- 3.2.4. Environmental Management: See Environmental Protection Policy

### **3.3. Contract Administration**

- 3.3.1. Contract documentation: All contracts shall be documented and kept up-to-date.
- 3.3.2. Contract management: All contracts shall be managed in accordance with the contract terms and conditions.
- 3.3.3. Payment management: All payments shall be made in accordance with the contract terms and conditions.

## **4. Key Project Management Components**

### **4.1. Project Initiation**

- 4.1.1. Project proposal: Develop a comprehensive project proposal outlining project scope, timeline, budget, and resources.
- 4.1.2. Project charter: Establish a project charter that defines project objectives, stakeholders, and roles and responsibilities.

### **4.2. Project Planning**

- 4.2.1. Project schedule: Develop a detailed project schedule, including milestones and deadlines.
- 4.2.2. Project budget: Establish a comprehensive project budget, including costs, expenses, and revenue.
- 4.2.3. Resource allocation: Allocate resources, including personnel, equipment, and materials, to ensure successful project delivery.

### **4.3. Project Execution**

- 4.3.1. Project monitoring and control: Monitor and control project progress, identifying and addressing deviations from the project plan.
- 4.3.2. Quality management: Implement quality management processes to ensure compliance with industry standards and regulatory requirements.
- 4.3.3. Risk management: Identify, assess, and mitigate risks that could impact project success.

### **4.4. Project monitoring and Controlling**

- 4.4.1. track, review, regulate the performance of the project;
- 4.4.2. identify areas in which changes to the plan are required
- 4.4.3. initiate the corresponding changes.

### **4.5. Project Closure**





- 8.2. **Design training:** All design staff shall receive training in design principles and practices.
- 8.3. **Construction Supervision training:** All construction supervision staff shall receive training in construction principles and practices.

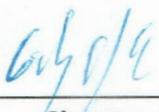
## 9. Policy Review and Revision

- 9.1. **Regular review:** This policy will be reviewed regularly to ensure it remains effective and compliant with the industry's best practices and regulatory requirements.
- 9.2. **Continuous improvement:** Opportunities for continuous improvement will be identified and implemented, as necessary, to ensure ongoing project management excellence.
- 9.3. This policy should be reviewed and revised annually, or as necessary.





## Project Risk Management Policy

Name of the Document	Project Risk Management Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** The purpose of this policy is to:
  - 1.1.1. **Identify risks:** Identify potential risks that may impact our projects.
  - 1.1.2. **Assess risks:** Assess the likelihood and impact of identified risks.
  - 1.1.3. **Manage risks:** Develop and implement strategies to mitigate or manage identified risks.
  - 1.1.4. **Monitor risks:** Continuously monitor and review the Risk Register to ensure that risks are properly managed.
- 1.2. **Scope:** This policy applies to all projects undertaken by BEZA, including:
  - 1.2.1. **Design projects:** Design projects, including architectural, engineering, and other design services.
  - 1.2.2. **Construction projects:** Construction projects, including building, civil engineering, and other construction services.

## 2. Risk Management Objectives

- 2.1. **Identify and Assess Risks:** Identify potential risks and assess their likelihood and impact.
- 2.2. **Mitigate Risks:** Develop and implement strategies to mitigate or manage identified risks.
- 2.3. **Monitor and Review Risks:** Continuously monitor and review risks to ensure effective management.

## 3. Policy Statement

- 3.1. BEZA is committed to identifying, assessing, and managing risks that may impact our projects.
- 3.2. This policy outlines our approach to risk management and the maintenance of a Project Risk Register.
- 3.3. **Policy Statement Definitions**
  - 3.3.1. **Risk:** is an event or circumstance that has the potential to impact on an organization's ability to achieve its objectives
  - 3.3.2. **Project Risk Management** is a systematic process of identifying, analyzing, prioritizing, and mitigating risks that may impact a project's objectives, timeline, budget, or quality.
  - 3.3.3. **Risk Assessment** is the process of identifying, analyzing, and evaluating potential risks that may impact an organization's ability to achieve its project's objectives.
  - 3.3.4. **Sanctionable Practice(s):** includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice, carried out in connection with a IfDB Group-Financed Activity, which warrants an investigation, an audit or a sanctions proceeding.
- 3.4. **Sanctionable Practices (Risks)** which BEZA has **Zero tolerance** of in ALL its Projects:
  - 3.4.1. Corrupt practices
  - 3.4.2. Fraudulent practices
  - 3.4.3. Collusive practices
  - 3.4.4. Coercive practices



### 3.4.5. Obstructive practices

## 4. Risk Management Process

- 4.1. **Risk Identification:** Identify potential risks through brainstorming sessions, risk workshops, and review of project documentation.
- 4.2. **Risk Assessment:** Assess identified risks using a risk matrix or other suitable methodology.
- 4.3. **Risk Prioritization:** Prioritize risks based on their likelihood and impact.
- 4.4. **Risk Mitigation:** Develop and implement strategies to mitigate or manage identified risks.
- 4.5. **Risk Monitoring and Review:** Continuously monitor and review risks to ensure effective management.

## 5. Project Compliance Risk Assessment Procedures

- BEZA categorizes Compliance Risk Assessment into; Regulatory Compliance Risks, Contractual Compliance Risks and Financial Compliance Risks, BEZA uses the COSO Risk Assessment Framework. Identify compliance risks, which are likely to happen, and those risks which have happened. Mitigate those risks which you have identified and reported so that their re-occurrence will be minimized.
- 5.1. **Regulatory Compliance Risks**
    - 5.1.1. **Environmental regulations:** Non-compliance with environmental regulations, such as pollution control and waste management.  
**Example:** if Likelihood is: Medium; Impact is: High; then Mitigation: Implement environmental management plan, conduct regular monitoring and reporting.
    - 5.1.2. **Health and safety regulations:** Non-compliance with health and safety regulations, such as workplace safety and employee training.  
**Example:** if Likelihood is: High; Impact is: High, then Mitigation is: Implement health and safety plan, conduct regular training and audits.
    - 5.1.3. **Labor laws and regulations:** Non-compliance with labor laws and regulations, such as employment standards and worker rights.  
**Example:** if Likelihood is Medium; Impact is: Medium, then Mitigation is: Implement labor management plan, conduct regular audits and training.
  - 5.2. **Contractual Compliance Risks**
    - 5.2.1. Contract terms and conditions: Non-compliance with contract terms and conditions, such as payment schedules and deliverables.  
**Example:** if Likelihood is: High, Impact is: High, then Mitigation is: Implement contract management plan, conduct regular reviews and audits.
    - 5.2.2. Subcontractor management: Non-compliance with subcontractor management regulations, such as subcontractor selection and monitoring.



**Example:** if Likelihood is: Medium, Impact is: Medium, then Mitigation is: Implement a subcontractor management plan, conduct regular monitoring and audits.

### 5.3. Financial Compliance Risks

5.3.1. **Financial reporting:** Non-compliance with financial reporting regulations, such as accounting standards and tax laws.

**Example:** if Likelihood is: High, Impact is: High, then Mitigation is: Implement financial management plan, conduct regular audits and reviews.

5.3.2. **Anti-corruption and bribery:** Non-compliance with anti-corruption and bribery regulations, such as gift policies and conflict of interest.

**Example:** if Likelihood is: Medium, Impact is: High, then Mitigation is: Implement anti-corruption and bribery policy, conduct regular training and audits.

## 6. Risk Mitigation Strategies

6.1. **Implement compliance policies and procedures:** Develop and implement compliance policies and procedures to ensure regulatory, contractual, and financial compliance.

6.2. **Conduct regular training and audits:** Conduct regular training and audits to ensure compliance with regulations, contracts, and financial requirements.

6.3. **Monitor and report compliance:** Monitor and report compliance with regulations, contracts, and financial requirements to ensure timely identification and mitigation of compliance risks.

## 7. Compliance Risk Management Plan

7.1. **Compliance risk assessment:** Conduct regular compliance risk assessments to identify and prioritize compliance risks.

7.2. **Compliance risk mitigation:** Implement compliance risk mitigation strategies to reduce the likelihood and impact of compliance risks.

7.3. **Compliance monitoring and reporting:** Monitor and report compliance with regulations, contracts, and financial requirements to ensure timely identification and mitigation of compliance risks.

## 8. Project Risk Categories

8.1. **Technical Risks:** Risks related to design, construction, and technical aspects of the project.

8.2. **Environmental Risks:** Risks related to environmental factors, such as weather, natural disasters, and environmental regulations.

8.3. **Financial Risks:** Risks related to project finances, such as cost overruns, funding issues, and cash flow problems.

8.4. **Operational Risks:** Risks related to project operations, such as safety risks, logistical issues, and supply chain disruptions.



- 8.5. **Strategic Risks:** Risks related to the project's alignment with the company's strategic objectives.
- 8.6. **Project risks:** Risks related to the project itself, including scope, schedule, budget, and quality.
- 8.7. **External risks:** Risks related to external factors, including weather, regulatory changes, and third-party actions.
- 8.8. **Organizational risks:** Risks related to the organization, including personnel, equipment, and financial resources.
- 8.9. **IFDB Sanctionable Risks at a Project level:** corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice.

## 9. Common Project Risks

- 9.1. Scope Risks: Risks related to changes in project scope.
- 9.2. Schedule Risks: Risks related to delays in project timelines.
- 9.3. Budget Risks: Risks related to cost overruns or budget constraints.
- 9.4. Quality Risks: Risks related to non-conformance to quality standards.
- 9.5. Resource Risks: Risks related to availability and allocation of resources.
- 9.6. *IFDB Sanctionable Risks*
- 9.7. *Project Implementation failure:* Risks related to implementing a project efficiently, effectively and economically

## 10. Risk Management Tools and Techniques

- 10.1. **Risk Register:** a framework that collects and documents all identified projects risks, the treatment management applied to mitigate the risks. This tool should be used by BEZA staff in managing and reporting project risks.
- 10.2. **Risk Matrix:** A tool used to assess and prioritize risks based on their likelihood and impact.
- 10.3. **Sensitivity Analysis:** A technique used to analyze the impact of changes in project variables on the project's outcomes.
- 10.4. **Decision Trees:** A tool used to evaluate different courses of action and their potential outcomes.
- 10.5. **Monte Carlo Simulations:** A technique used to analyze the impact of uncertainty on project outcomes.

## 11. Project Risk Register Procedures

- 11.1. **Risk identification:** Risks shall be identified through a combination of techniques, including:
  - 11.1.1. Brainstorming
  - 11.1.2. Review of project documentation
  - 11.1.3. Consultation with stakeholders



- 11.2. **Risk assessment:** Identified risks shall be assessed using a risk matrix, which considers:
  - 11.2.1. Likelihood of occurrence
  - 11.2.2. Potential impact
- 11.3. **Risk prioritization:** Risks shall be prioritized based on their assessed likelihood and impact.
- 11.4. **Risk mitigation:** Strategies shall be developed and implemented to mitigate or manage identified risks.
- 11.5. **Risk monitoring:** The Risk Register shall be continuously monitored and reviewed to ensure that risks are properly managed.

## 12. Roles and Responsibilities

- 12.1. **Project Manager/ Resident Engineer:** Responsible for identifying, assessing, and mitigating risks, and for ensuring that risk management is integrated into the project plan.
- 12.2. **Risk Manager:** Responsible for developing and implementing the risk management plan, and for monitoring and reviewing risks.
- 12.3. **Project Team members:** Responsible for identifying and reporting project risks, and for implementing risk mitigation strategies.

## 13. Training and Awareness

- 13.1. **Risk Management Training:** Provide training to project managers and team members on risk management principles, tools, and techniques.
- 13.2. **Risk Awareness:** Ensure that all project stakeholders are aware of the risks associated with the project and the measures being taken to mitigate them.

## 14. Review and Revision

- 14.1. **Regular Review:** Review the project risk management policy regularly to ensure it remains effective and relevant.
- 14.2. **Revision:** Revise the policy as necessary to reflect changes in the company's risk management approach or to address emerging risks.

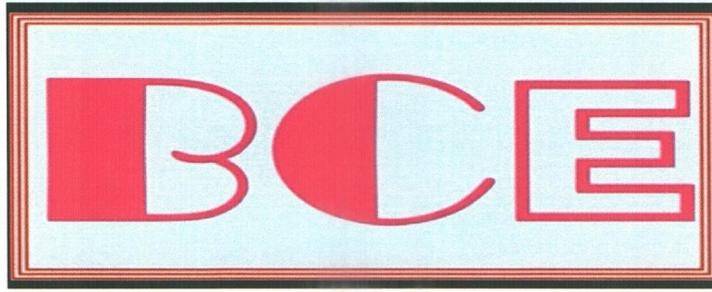


## 15. Appendix

### Definition of Additional Terms

- 1.1. **Corrupt practices:** The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party.
- 1.2. **Fraudulent practices:** Any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- 1.3. **Collusive practices:** An arrangement between two or more parties designed to achieve an improper purpose, including to improperly influence the actions of another party.
- 1.4. **Coercive practices:** Impairing or harming or threatening to directly or indirectly impair or harm any party or the property of the party, to improperly influence the actions of a party.
- 1.5. **Obstructive practices:**
  - 1.5.1. Destroying, falsifying, altering all concealing of evidence material to a bank investigation, or making false statements to investigators, with the intent to impede a bank group investigation.
  - 1.5.2. Threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to a bank group investigation or from pursuing investigation or,
  - 1.5.3. acts intended to impede the exercise of the AfBD Group's contractual rights of audits or inspection or access to information.





## Records Management Policy

Name of the Document	Records Management Policy	
Approved by Board Chairperson Mr. Gidey Gebregziabher Gebremariam	 Signature	Date: 02 May 2025

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



## 1. Purpose and Scope

- 1.1. **Purpose:** Establish a policy for managing records to ensure compliance with regulatory requirements, industry standards, and company objectives.
- 1.2. **Scope:** Applies to all records created, received, or maintained by the company, including physical and electronic records.

## 2. Definitions

- 2.1. **Records:** All documents, files, and data created, received, or maintained by the company, including but not limited to:
  - 2.1.1. Project files
  - 2.1.2. Design documents
  - 2.1.3. Construction records
  - 2.1.4. Financial records
  - 2.1.5. Correspondence
  - 2.1.6. Emails
  - 2.1.7. Business Partner documents
  - 2.1.8. Employee documents
- 2.2. **Records Management:** The systematic control and maintenance of records throughout their lifecycle.

## 3. Records Management Objectives

- 3.1. **Compliance:** Ensure compliance with regulatory requirements, industry standards, and company policies.
- 3.2. **Transparency:** Maintain accurate and complete records to ensure transparency and accountability.
- 3.3. **Efficiency:** Manage records in a way that supports efficient business operations.
- 3.4. **Risk Management:** Minimize risks associated with records management, including data breaches and loss of critical information.

## 4. Records Management Responsibilities

- 4.1. **Records Manager:** Appoint a Records Manager to oversee the implementation of this policy.
- 4.2. **Department Heads:** Ensure that departmental records are managed in accordance with this policy.



- 4.3. Employees: Ensure that all employees understand their roles and responsibilities in managing records.

## 5. Records Management Procedures

- 5.1. Records Creation: Ensure that all records are created and captured in a controlled environment.
- 5.2. Records Storage: Store records in a secure and accessible location.
- 5.3. Records Retrieval: Ensure that records can be retrieved and accessed in a timely manner.
- 5.4. Records Retention Lifespan: BEZA keeps records (defined in Section 2) for a maximum period of 15 years and some records are permanent. Please see the approved General Engineering Document Retention Lifespans in Appendix under section 11 below.
- 5.5. Records Disposal: Dispose of records in accordance with approved retention schedules and destruction methods.

## 6. Retention Schedules

- 6.1. Develop Retention Schedules: Develop and maintain retention schedules for all records.
- 6.2. Retention Periods: Establish retention periods for all records, based on regulatory requirements, industry standards, and company objectives.

## 7. Security and Access

- 7.1. Security Measures: Implement security measures to protect records from unauthorized access, disclosure, or destruction.
- 7.2. Access Controls: Establish access controls to ensure that only authorized personnel can access records.

## 8. Monitoring and Review

- 8.1. Regular Review: Regularly review this policy to ensure it remains effective and relevant.
- 8.2. Audit and Compliance: Conduct regular audits to ensure compliance with this policy and regulatory requirements.

## 9. Training and Awareness

- 9.1. Training Programs: Develop and implement training programs to ensure that all employees understand their roles and responsibilities in managing records.



9.2. Awareness: Promote awareness of the importance of records management throughout the company.

## 10. Review and Revision

10.1. Regular Review: Regularly review this policy to ensure it remains effective and relevant.

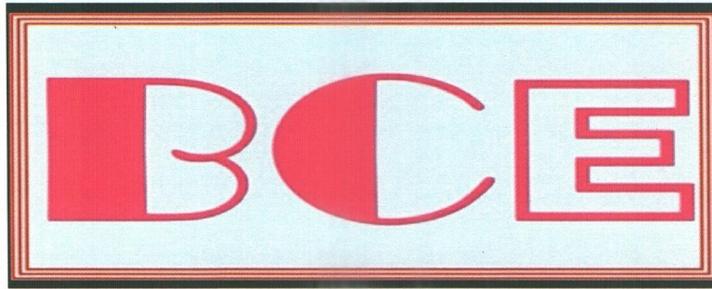
10.2. Revision: Revise this policy as necessary to reflect changes in laws, regulations, or company objectives.

## 11. Appendix

### General Engineering Document Retention Lifespans

Type of Record	Recommended Retention Period	Notes
Design Drawings (As-Built)	Permanent	Critical for future maintenance, modifications, and legal defense.
Project Specifications & Manuals	10–15 years or permanent	Often kept for the life of the facility or asset.
Engineering Calculations	10–15 years	Especially important for safety-critical systems.
Technical Reports & Feasibility Studies	7–10 years	Unless tied to a long-lived asset.
Change Orders / Revisions	Life of the project + 7–10 years	Useful for traceability and audits.
Material Certificates & Test Results	10–15 years	Or longer if linked to warranty or regulatory needs.
Inspection & Quality Control Records	7–15 years	May be subject to quality system (e.g., ISO 9001) retention rules.
Maintenance & Repair Logs	Life of asset + 5–10 years	Important for safety and lifecycle costing.
CAD/BIM Models	Project life + 10–15 years	Increasingly seen as long-term assets.
Contracts, Agreements & Permits	7–15 years after project close	Legal protection and compliance.
Emails/Correspondence Related to Engineering Decisions	5–10 years	Depends on the importance of decisions made.





## Related Parties, Former Public Officials, and Conflicts of Interest Policy

<b>Name of the Document</b>	<b>Related Parties, Former Public Officials, and Conflicts of Interest Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	<hr style="width: 80%; margin: 5px auto;"/> <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



## 1. Purpose and Scope

- 1.1. **Purpose:** BEZA is committed to maintaining the highest standards of integrity, transparency, and accountability in all its business dealings. This policy aims to prevent conflicts of interest, ensure compliance with applicable laws and regulations, and maintain public trust.
- 1.2. **Scope:** This policy applies to all BEZA employees, officers, directors, contractors, and third-party service providers.

## 2. Key Terms Definitions

- 2.1. **Related Party:** A person or entity that has a close relationship with BEZA or its employees, officers, or directors, including family members, business partners, and affiliates.
- 2.2. **Former Public Official:** An individual who has held a public office or position, including elected officials, government employees, and members of regulatory bodies.
- 2.3. **Conflict of Interest:** A situation where an individual's personal interests or relationships conflict with their duties and responsibilities to BEZA.

## 3. Policy Statement

- 3.1. BEZA prohibits conflicts of interest, including those arising from related parties, former public officials, and personal relationships. Employees, officers, directors, contractors, and third-party service providers must:
  - 3.1.1. **Avoid conflicts of interest:** Refrain from engaging in any activity or transaction that may create a conflict of interest.
  - 3.1.2. **Disclose related parties and former public officials:** Report any related parties or former public officials to the Compliance Officer.
  - 3.1.3. **Obtain approval for transactions:** Obtain approval from the Compliance Officer or designated authority before engaging in any transaction with a related party or former public official.
  - 3.1.4. **Maintain confidentiality:** Protect confidential information and avoid using it for personal gain.

## 4. Policy Procedures

- 4.1. **Identification and disclosure:** Employees, officers, directors, contractors, and third-party service providers must identify and disclose any related parties, former public officials, or conflicts of interest to the Compliance Officer.
- 4.2. **Review and approval:** The Compliance Officer or designated authority will review and approve or reject transactions involving related parties or former public officials.



- 4.3. **Monitoring and reporting:** The Compliance Officer will monitor and report on conflicts of interest and related party transactions to the Board of Directors or designated authority.

## 5. Consequences of Non-Compliance

Failure to comply with this policy may result in:

- 5.1. **Disciplinary action:** Disciplinary action, up to and including termination.  
5.2. **Legal action:** Legal action, including fines and penalties.  
5.3. **Reputation damage:** Damage to BEZA's reputation and public trust.

## 6. Related Party Transactions

- 6.1. **Identification:** Identify all related party transactions, including sales, purchases, leases, and other business arrangements.  
6.2. **Approval:** Obtain approval from the board of directors or a designated committee for all related party transactions.  
6.3. **Disclosure:** Disclose all related party transactions in the company's financial statements and other public disclosures.

## 7. Conflicts of Interest

- 7.1. **Disclosure:** Require employees, directors, and officers to disclose any conflicts of interest.  
7.2. **Recusal:** Recuse individuals with conflicts of interest from participating in decisions related to the conflict.  
7.3. **Mitigation:** Develop and implement plans to mitigate conflicts of interest.

## 8. Gifts and Hospitality

- 8.1. **Policy:** Establish a policy on gifts and hospitality, including limits on value not exceeding US\$50 and frequency. (See Gifts and Donation Policy)  
8.2. **Disclosure:** Require employees, directors, and officers to disclose all gifts and hospitality received.

## 9. Controls against corruption and bribery when hiring former public officials and Related parties

- 9.1. **Controls Against Corruption and Bribery**



- 9.1.1. *Cooling-Off Period*: Implement a cooling-off period of at least 1-2 years before hiring a former public official. This allows for a separation between their former public role and their new private sector role.
- 9.1.2. *Background Checks*: Conduct thorough background checks on former public officials, including reviews of their employment history, financial records, and any potential conflicts of interest.
- 9.1.3. *Code of Conduct*: Ensure that former public officials sign a code of conduct that outlines the company's anti-corruption and bribery policies.
- 9.1.4. *Confidentiality Agreements*: Have former public officials sign confidentiality agreements to prevent them from disclosing sensitive information.
- 9.1.5. *Restrictions on Lobbying*: Implement restrictions on lobbying activities by former public officials, including prohibitions on lobbying their former government agency or department.
- 9.1.6. *Gift and Entertainment Policies*: Establish gift and entertainment policies that prohibit former public officials from accepting gifts or entertainment from clients or vendors.
- 9.1.7. *Training and Education*: Provide training and education to former public officials on anti-corruption and bribery laws, regulations, and company policies.
- 9.1.8. *Monitoring and Auditing*: Regularly monitor and audit the activities of former public officials to ensure compliance with company policies and anti-corruption laws.

**9.2. Hiring Process Controls**

- 9.2.1. *Independent Hiring Committee*: Establish an independent hiring committee to review and approve the hiring of former public officials.
- 9.2.2. *Transparent Hiring Process*: Ensure that the hiring process is transparent, with clear criteria and evaluation procedures.
- 9.2.3. *No Preferential Treatment*: Ensure that former public officials are not given preferential treatment in the hiring process.
- 9.2.4. *Verification of Credentials*: Verify the credentials and qualifications of former public officials.

**9.3. Post-Hiring Controls**

- 9.3.1. *Regular Performance Reviews*: Conduct regular performance reviews of former public officials to ensure they are meeting company expectations and complying with company policies.
- 9.3.2. *Confidentiality and Non-Disclosure Agreements*: Have former public officials sign confidentiality and non-disclosure agreements to prevent them from disclosing sensitive company information.
- 9.3.3. *Monitoring External Communications*: Monitor the external communications of former public officials to ensure they are not engaging in lobbying or other activities that may create conflicts of interest.



- 9.3.4. **Reporting of Suspected Corruption or Bribery:** Establish a reporting mechanism for suspected corruption or bribery and ensure that former public officials understand their obligations to report any suspicious activity.

## 10. Reporting and Monitoring

- 10.1. **Reporting:** Require employees, directors, and officers to report any related party transactions or conflicts of interest.
- 10.2. **Monitoring:** Monitor related party transactions and conflicts of interest to ensure compliance with this policy.

## 11. Consequences of Non-Compliance

- 11.1. **Disciplinary Action:** Take disciplinary action against employees, directors, and officers who fail to comply with this policy.
- 11.2. **Financial Consequences:** Impose financial consequences, including repayment of benefits received, for non-compliance.

## 12. Review and Revision

- 12.1. **Regular Review:** Review this policy regularly to ensure it remains effective and relevant.
- 12.2. **Revision:** Revise this policy as necessary to reflect changes in laws, regulations, or company objectives.



## 13. Declaration of Conflict-of-Interest form

I, [Employee Name], hereby declare that I have read and understood the Conflict-of-Interest Policy of BEZA. I understand that it is my responsibility to disclose any actual or potential conflicts of interest that may arise during my employment with the company.

### Disclosure of Conflict of Interest

I hereby disclose the following actual or potential conflicts of interest:

- Any personal or financial interests that may conflict with my duties and responsibilities as an employee of BEZA:

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- Any relationships with suppliers, contractors, or other third parties that may conflict with my duties and responsibilities as an employee of BEZA:

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- Any other actual or potential conflicts of interest that may arise during my employment with BEZA:

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### Acknowledgement

I acknowledge that:

- I am responsible for disclosing any actual or potential conflicts of interest that may arise during my employment with BEZA.
- I will not engage in any activities that may conflict with my duties and responsibilities as an employee of BEZA.
- I will comply with the Conflict-of-Interest Policy of BEZA and report any actual or potential conflicts of interest to my supervisor or the HR department.

### Signature

I, [Employee Name], hereby declare that the information provided above is accurate and complete to the best of my knowledge.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_





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## 1. Purpose and Scope

- 1.1. **Purpose:** Establish a policy for sub-contracting and partnering to ensure that all sub-contracts and partnerships are properly managed and aligned with the company's objectives.
- 1.2. **Scope:** Applies to all sub-contracts and partnerships entered by the company.

## 2. Sub-Contracting Policy

- 2.1. **A sub-contract:** is an agreement between the company and a sub-contractor for the provision of goods or services.
- 2.2. **Approval:** All sub-contracts must be approved by the relevant manager or director.
- 2.3. **Selection:** Sub-contractors shall be selected based on their qualifications, experience, and ability to meet the company's requirements.
- 2.4. **Contract Terms:** All sub-contracts shall include terms and conditions that protect the company's interests.

## 3. Partnering Policy

- 3.1. Definition: **A partnership** is an agreement between the company and one or more partners to collaborate on a project or business venture.
- 3.2. **Business Partnering-Contract** is a formal agreement between two or more parties that outlines the terms and conditions of their partnership. It's a legally binding document that defines the roles, responsibilities, and expectations of each partner.
- 3.3. **Approval:** All partnerships must be approved by the Board of Directors.
- 3.4. **Selection:** Partners shall be selected based on their qualifications, experience, and ability to meet the company's objectives.
- 3.5. **Partnership Agreement:** All partnerships shall be governed by a partnership agreement that outlines the terms and conditions of the partnership.
- 3.6. **Types of Business Partnering Contracts** BEZA can enter:
  - 3.6.1. **Joint Venture Agreement:** A contract between two or more parties to undertake a specific project or business venture.
  - 3.6.2. **Partnership Agreement:** A contract between two or more parties to form a partnership, outlining the terms and conditions of the partnership.
  - 3.6.3. **Limited Liability Partnership (LLP) Agreement:** A contract between two or more parties to form an LLP, providing liability protection for partners.
  - 3.6.4. **Strategic Alliance Agreement:** A contract between two or more parties to collaborate on a specific project or business initiative.
  - 3.6.5. Sub consultancy agreements
  - 3.6.6. Association agreements
  - 3.6.7. Consortiums



## 4. Due Diligence on Business Partners and Sub-contractors

### 4.1. Scope of Due Diligence

BEZA looks at the following areas before and during the contracted project works:

- 4.1.1. Company profile and history: Verify the company's existence, ownership structure, and business history.
- 4.1.2. Financial performance: Evaluate the company's financial stability, creditworthiness, and ability to meet financial obligations.
- 4.1.3. Reputation and credibility: Assess the company's reputation, credibility, and integrity through references, reviews, and ratings.
- 4.1.4. Compliance with laws and regulations: Verify the company's compliance with relevant laws, regulations, and industry standards.
- 4.1.5. Contractual obligations: Review the company's contractual obligations, including any outstanding disputes or litigation.
- 4.1.6. Insurance and liability: Verify the company's insurance coverage and liability for potential risks and losses.
- 4.1.7. **Multilateral Development Banks (MDB) and IFDB Sanctionable Practice(s)**: includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice. Check whether the "would-be" project partner has been sanctioned by AfDB or not.

### 4.2. Due Diligence Process

BEZA does due diligence process in the following steps:

- 4.2.1. Initial screening: Conduct an initial review of the potential partner's company profile, financial performance, and reputation.
- 4.2.2. Request for information: Request additional information from the potential partner, including financial statements, contracts, and references.
- 4.2.3. On-site visit: Conduct an on-site visit to verify the company's operations, meet with key personnel, and assess the company culture.
- 4.2.4. Reference checks: Verify the company's reputation and credibility through reference checks with customers, suppliers, and partners.
- 4.2.5. Review of contracts and agreements: Review the company's contracts and agreements to ensure compliance with laws and regulations.
- 4.2.6. Final assessment: Conduct a final assessment of the potential partner's credibility, reliability, and potential risks and benefits.

## 5. Roles and Responsibilities

- 5.1. **Project Manager**: Responsible for managing sub-contracts and partnerships on a project-by-project basis.



- 5.2. **Procurement Manager:** Responsible for selecting and approving sub-contractors and partners.
- 5.3. **Contract Manager:** Responsible for negotiating and administering sub-contracts and partnership agreements.

## 6. Monitoring and Review

- 6.1. **Regular Review:** Regularly review sub-contracts and partnerships to ensure they are meeting the company's objectives.
- 6.2. **Performance Monitoring:** Monitor the performance of sub-contractors and partners to ensure they are meeting the required standards.
- 6.3. **Audit and Compliance:** Ensure that all sub-contracts and partnerships comply with relevant laws and regulations.

## 7. Confidentiality and Intellectual Property

- 7.1. **Confidentiality:** All sub-contractors and partners shall maintain the confidentiality of the company's information and intellectual property.
- 7.2. **Intellectual Property:** The company shall retain ownership of all intellectual property rights related to sub-contracts and partnerships.

## 8. Collective Action

- 8.1. BEZA, acts with its contractors, sub-contractors, suppliers, employees and other stakeholders to promote Integrity best practices. This ensures industry fluidity and fairness in terms of competition.
- 8.2. Integrity best practices are put and communicated to other contracting parties in the contracts as policy statements, procedures or caveats.
- 8.3. All parties to the contract (**contractors, sub-contractors and project partners**) should **avoid committing Sanctionable Practice(s):** which includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice

## 9. Termination

- 9.1. **Termination:** The Company reserves the right to terminate any sub-contract or partnership agreement if the sub-consultant or partner fails to meet the required standards or comply with the terms and conditions of the agreement or the spirit of collective action. (Refer to standard operating procedures for managing ongoing project services)



## 10. Governing Law

- 10.1. **Governing Law:** This policy shall be governed by and construed in accordance with the laws of the country or state, in which the agreement apply

## 11. Review and Revision

- 11.1. **Regular Review:** Regularly review this policy to ensure it remains effective and relevant.
- 11.2. **Revision:** Revise this policy as necessary to reflect changes in laws, regulations, or company objectives.



## 12. A Sample of a Sub-contracting Contract in Projects

### SUB-CONTRACTING CONTRACT

This Sub-contracting Contract ("Contract") is made and entered into on [Date] ("Effective Date") by and between:

[Main Contractor's Company Name] ("Main Contractor")  
[Address]  
[City, State, ZIP]

And

[Sub-contractor's Company Name] ("Sub-contractor")  
[Address]  
[City, State, ZIP]

### RECITALS

WHEREAS, the Main Consultant has been awarded a contract by [Client's Name] ("Client") for the [Project Name] ("Project"); and

WHEREAS, the Main Contractor desires to engage the Sub-consultant to perform certain work and provide certain services in connection with the Project.

### ARTICLE 1: SCOPE OF WORK

1.1 The Sub-contractor shall perform the work and provide the services described in Exhibit A ("Scope of Work") attached hereto.

1.2 The Sub-contractor shall comply with all applicable laws, regulations, and industry standards in performing the Work.

### ARTICLE 2: TERM AND TERMINATION

2.1 The term of this Contract shall commence on the Effective Date and continue until the completion of the Work.

2.2 Either party may terminate this Contract upon [Number] days' written notice to the other party.

### ARTICLE 3: COMPENSATION AND PAYMENT TERMS

3.1 The Main Contractor shall pay the Sub-contractor the compensation described in Exhibit B ("Compensation and Payment Terms") attached hereto.

3.2 The Sub-contractor shall submit invoices to the Main Contractor on a monthly basis, and the Main Contractor shall pay such invoices within [Number] days.

### ARTICLE 4: RESPONSIBILITIES AND OBLIGATIONS

4.1 The Sub-contractor shall:

- a. Perform the Work in accordance with the Scope of Work and industry standards;
- b. Provide all necessary equipment, materials, and labor to perform the Work;
- c. Comply with all safety regulations and maintain a safe working environment.

4.2 The Main Contractor shall:



- a. Provide the Sub-contractor with access to the Project site and necessary information;
- b. Coordinate the Sub-contractor's work with other contractors and subcontractors;
- c. Pay the Sub-contractor in accordance with the Compensation and Payment Terms.

**ARTICLE 5: INTELLECTUAL PROPERTY AND CONFIDENTIALITY**

5.1 The Sub-contractor shall not disclose any confidential information of the Main Contractor or the Client.

5.2 The Sub-contractor shall not use any intellectual property of the Main Contractor or the Client without prior written consent.

**ARTICLE 6: INDEMNIFICATION AND INSURANCE**

6.1 The Sub-contractor shall indemnify and hold harmless the Main Contractor and the Client against any claims, damages, and expenses arising from the Sub-contractor's negligence or breach of this Contract.

6.2 The Sub-contractor shall maintain liability insurance and workers' compensation insurance as required by law.

**ARTICLE 7: DISPUTE RESOLUTION**

7.1 Any disputes arising from this Contract shall be resolved through mediation and arbitration in accordance with the rules of the American Arbitration Association.

**ARTICLE 8: GOVERNING LAW**

8.1 This Contract shall be governed by and construed in accordance with the laws of [State/Country].

**IN WITNESS WHEREOF**

The parties have executed this Contract as of the date first above written.

---

[Main Contractor's Signature]  
[Main Contractor's Name]  
[Main Contractor's Title]  
[Date]

---

[Sub-contractor's Signature]  
[Sub-contractor's Name]  
[Sub-contractor's Title]  
[Date]

EXHIBIT A: SCOPE OF WORK

[Insert Scope of Work description]

EXHIBIT B: COMPENSATION AND PAYMENT TERMS

[Insert Compensation and Payment Terms description]



## 13. A sample Partnering-Contract in Projects

### Partnering Agreement

This Partnering Agreement ("Agreement") is made and entered into on [Date] ("Effective Date") by and between:

[Company Name] ("Client")  
[Address]  
[City, State, ZIP]

And

[Partner Company Name] ("Partner")  
[Address]  
[City, State, ZIP]

### Recitals

WHEREAS the Client and the Partner (collectively, the "Parties") wish to collaborate on the [Project Name] ("Project"); and

WHEREAS the Parties desire to establish a partnering relationship to ensure the successful delivery of the Project.

### Article 1: Purpose and Objectives

1.1 The purpose of this Agreement is to establish a partnering relationship between the Parties for the delivery of the Project.

1.2 The objectives of this Agreement are:

- a. To ensure the successful delivery of the Project;
- b. To promote a culture of collaboration, trust, and open communication;
- c. To share risks and rewards;
- d. To improve efficiency and reduce costs.

### Article 2: Roles and Responsibilities

2.1 The Client shall:

- a. Provide project requirements and specifications;
- b. Approve project plans and schedules;
- c. Provide access to project sites and facilities.

2.2 The Partner shall:

- a. Provide expertise and resources for the Project;
- b. Develop and implement project plans and schedules;
- c. Manage and supervise project staff.

### Article 3: Partnering Principles





**Article 12: Notices**

12.1 All notices and communications shall be in writing and delivered personally or by certified mail.

**IN WITNESS WHEREOF**

The Parties have executed this Agreement as of the date first above written.

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[Client Signature]

[Client Name]

[Client Title]

[Date]

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[Partner Signature]

[Partner Name]

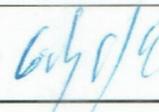
[Partner Title]

[Date]





## Whistleblowing Policy

<b>Name of the Document</b>	<b>Whistleblowing Policy</b>	
<b>Approved by Board Chairperson</b> Mr. Gidey Gebregziabher Gebremariam	 _____ <b>Signature</b>	<b>Date: 02 May 2025</b>

### AMENDMENT AND APPROVAL RECORD

Amendment No.	Amendment description	Originator	Approved By	Date



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## 1. Purpose and Scope

- 1.1. **Purpose:** To establish a whistleblowing policy that encourages employees to report concerns or wrongdoing, promoting a culture of transparency and accountability.
  - 1.1.1. **Encourage reporting:** Encourage employees, contractors, and other stakeholders to report concerns or wrongdoing.
  - 1.1.2. **Protect whistleblowers:** Protect whistleblowers from retaliation, harassment, or victimization.
  - 1.1.3. **Investigate concerns:** Investigate concerns or wrongdoing in a fair, thorough, and timely manner.
- 1.2. **Scope:** Applies to all employees, sub-consultant, and stakeholders.
  - 1.2.1. **Employees:** All employees, including permanent, temporary, and contract staff.
  - 1.2.2. **Contractors:** All contractors, consultants, and third-party service providers.
  - 1.2.3. **Other stakeholders:** Other stakeholders, including clients, customers, and suppliers.

## 2. Definitions

- 2.1. **Whistleblowing:** Reporting concerns or wrongdoing, including unethical behavior, fraud, or illegal activities by either former or current employees and stakeholders (customers, or service providers).
- 2.2. **Protected Disclosure:** A disclosure made in good faith, without malice, and in public interest.

## 3. Related Ethiopian Legislative Frameworks for references

- 3.1. This policy statement complies with the Ethiopia Domestic whistleblowing and protection of whistleblowers laws and the Ethiopia Domestic laws.
- 3.2. The following are the primary legislations governing the protection of whistleblowers in Ethiopia:
  - 3.2.1. The Revised Federal Ethics and Anti-Corruption Commission Proclamation No. 1236/2021 (REACC Proclamation)
  - 3.2.2. The Protection of Witnesses and Whistleblowers of Criminal Offences Proclamation No. 699/2010 (PWWCO Proclamation)
  - 3.2.3. Revised Anti-Corruption Special Procedure and Rules of Evidence Proclamation No. 434/2005
  - 3.2.4. Revised Anti-Corruption Special Procedure and Rules of Evidence (Amendment) Proclamation No. 882/2015]



## 4. Whistleblowing Policy Statement

- 4.1. BEZA is committed to maintaining a culture of transparency, accountability, and integrity.
- 4.2. This Whistleblowing Policy aims to provide a framework for employees, contractors, and other stakeholders to report concerns or wrongdoing in a confidential and protected manner.

### 4.3. Types of Concerns / Wrongdoing to report

- 4.3.1. This Policy Statement covers concerns or wrongdoing related to:

- 4.3.1.1. **Multilateral Development Banks (MDB)** and **IfDB Group-wide Sanctionable Practice(s)**: which includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice
- 4.3.1.2. **Civil engineering projects**: Concerns or wrongdoing related to civil engineering projects, including design, construction supervision, and project management.
- 4.3.1.3. **Health and safety risks**: Health and safety risks, including risks to employees, contractors, or the public.
- 4.3.1.4. **Environmental damage**: Environmental damage, including pollution, waste management, or conservation issues.
- 4.3.1.5. **Compliance breaches**: Compliance breaches, including non-compliance with laws, regulations, or company policies.
- 4.3.1.6. **Unethical behavior**: Unethical behavior, including, bribery, falsifying records, bid rigging, harassment, bullying, or discrimination.

### 4.4. Protection of Whistleblowers

- 4.4.1. Whistleblowers will be protected from:

- 4.4.1.1. **Retaliation**: Retaliation, including disciplinary action, harassment, or victimization.
- 4.4.1.2. **Harassment**: Harassment, including bullying, intimidation, or coercion.
- 4.4.1.3. **Victimization**: Victimization, including unfair treatment or discrimination.

### 4.5. Confidentiality

- 4.5.1. All reported concerns or wrongdoing will be treated as confidential, except where:
  - 4.5.1.1. **Disclosure is required**: Disclosure is required by law or regulation.
  - 4.5.1.2. **Investigation requires disclosure**: Disclosure is necessary to conduct a thorough investigation.

## 5. The whistleblowing management system

- 5.1. Receiving reports
- 5.2. Assessing reports
- 5.3. Investigating reports
- 5.4. Concluding cases



## 6. Reporting Concerns

Concerns or wrongdoing can be reported through:

- 6.1. **Confidential hotline and email address:**
  - 6.1.1. **Telephone Hotline:** +251-0114-705130
  - 6.1.2. **Email Hotline:** [Whistle@bezaconsultinc.com](mailto:Whistle@bezaconsultinc.com)
- 6.2. **Whistleblowing officer:** A designated whistleblowing officer, [Mesfin Nesru/ Compliance Officer] and [Alazar Berhanu/Compliance Analyst].
- 6.3. **Manager or supervisor:** An employee's manager or supervisor.

## 7. Reporting Procedures

- 7.1. **Reporting Mechanism:** A Hotline and an email have been established as reporting mechanisms, to report concerns or wrongdoing.
- 7.2. **Confidentiality:** Ensure confidentiality of reports and protection of whistleblowers' identities.
- 7.3. **Confidential reporting:** the person receiving a report knows the identity of the whistleblower but will not make it known to anyone else without permission from the person reporting wrongdoing - unless there is an overriding legal obligation to do otherwise.
- 7.4. **Anonymous reporting:** the whistleblower does not state his or her name when reporting unethical conduct. No one will know who reported the wrongdoing
- 7.5. **Initial Response:** Respond promptly to reports, acknowledging receipt and outlining the next steps.
- 7.6. **Assessment:** The person receiving the report has to assess the weight of the report and evaluate whether there was a breach of BEZA's ethics or not.
- 7.7. **Pass the Initial Assessment report the Investigation team**

## 8. Investigation Procedures

- 8.1. **Investigation Team:** Assemble an investigation team, including internal auditors, lawyers, and other experts.
- 8.2. **Evidence Collection:** Collect and preserve evidence, including documents, emails, and witness statements.
- 8.3. **Interviews:** Conduct interviews with whistleblowers, witnesses, and other relevant parties.



## 9. Protection of Whistleblowers

- 9.1. **Confidentiality:** Protect whistleblowers' identities and maintain confidentiality throughout the investigation.
- 9.2. **No Retaliation:** Ensure no retaliation or adverse action is taken against whistleblowers.
- 9.3. **Support:** Provide support and protection for whistleblowers, including counseling and legal assistance.

## 10. Findings from an Investigation

- 10.1. **Findings:** Document investigation findings, including conclusions and recommendations.
- 10.2. **Corrective Action:** Implement corrective action, including disciplinary measures, dismissal, policy changes, or process improvements.
- 10.3. **Feedback:** Provide feedback to whistleblowers on investigation outcomes and actions taken.

## 11. Implementation of the Policy

- 11.1. **Whistleblowing officer:** A designated whistleblowing officer, receives the reports from whistleblowers
- 11.2. **Manager or supervisor:** Compliance Manager authorizes investigation of the alleged wrongdoing.
- 11.3. **Investigator:** May be outsourced if BEZA does not have the investigative skills. Otherwise, the Monitoring and Compliance Officer should investigate such cases of wrongdoing.
- 11.4. **Ethics and Compliance Management Committee:** This management committee receives reports and pass decisions as an Action against wrongdoing.

## 12. Accountability and Oversight

- 12.1. **Accountability:** Hold management and employees accountable for implementing and enforcing the Whistleblowing Policy.
- 12.2. **Oversight:** Establish oversight mechanisms, including audits and reviews, to ensure compliance with the policy.

## 13. Training and Awareness

- 13.1. **Training:** Provide regular training on the Whistleblowing Policy and procedures.
- 13.2. **Awareness:** Promote awareness of the policy and the importance of reporting concerns or wrongdoing.



## 14. Review and Revision

- 14.1. **Regular Review:** Review the Whistleblowing Policy regularly to ensure it remains effective and relevant.
- 14.2. **Revision:** Revise the policy as necessary to reflect changes in laws, regulations, or company policies.

## 15. Appendix

### Definition of Additional Terms

- 1.1. **Sanctionable Practice(s):** includes corrupt practice, fraudulent practice, collusive practice, coercive practice, or obstructive practice, carried out in connection with a IfDB Group-Financed Activity, which warrants an investigation, an audit or a sanctions proceeding.
- 1.2. **Corrupt practices:** The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party.
- 1.3. **Fraudulent practices:** Any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- 1.4. **Collusive practices:** An arrangement between two or more parties designed to achieve an improper purpose, including to improperly influence the actions of another party.
- 1.5. **Coercive practices:** Impairing or harming or threatening to directly or indirectly impair or harm any party or the property of the party, to improperly influence the actions of a party.
- 1.6. **Obstructive practices:**
  - 1.6.1. Destroying, falsifying, altering all concealing of evidence material to a bank investigation, or making false statements to investigators, with the intent to impede a bank group investigation.
  - 1.6.2. Threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to a bank group investigation or from pursuing investigation or,
  - 1.6.3. acts intended to impede the exercise of the AfBD Group's contractual rights of audits or inspection or access to information.

