

# **Anti – Bribery Policy**

## **Objective & extend of coverage**

It is the policy of the company to conduct & operate our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings. This policy applies to all full time & part time (whether permanent, fixed term or temporary) employed individuals at all levels and grades, including senior managers, directors, consultants, office & site staffs, contractors, and any other person providing services to us

## **Definition of bribery**

A bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly or to any person with the intention of making in return for a business favor or advantage by influencing them to give preference, assistance in apart from the way which it shall be.

## **Exemption for gifts and hospitality**

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, we will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a person in the performance of his works

## **Record Keeping**

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted for management's approval and specifically recorded the reason for the expenditure. All accounts, invoices and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **Report and monitoring**

Employees will be encouraged to report or raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any penalty or discrimination as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.