

Prohibited Conduct Document

Anti-Bribery Policy

This document outlines the behaviors and actions that are strictly prohibited for all employees, agents, contractors, and third parties representing the company in accordance with our Anti-Bribery Policy.

1. Bribery and Corruption

- Offering, promising, giving, requesting, or accepting bribes in any form, directly or indirectly, to or from any person or organization.
- Making facilitation payments intended to expedite routine government actions or secure advantages.
- Providing or accepting cash, gifts, hospitality, or anything of value to influence a business decision or gain improper advantage.

2. Improper Payments and Benefits

- Providing unauthorized payments, commissions, or kickbacks to customers, suppliers, public officials, or any third party.
- Receiving any benefits, discounts, or advantages in exchange for preferential treatment or business favors.

3. Concealment & Falsification

- Falsifying company records, accounts, invoices, or financial documents to conceal bribery or other prohibited conduct.
- Deliberately omitting or misrepresenting details in expense reports, gift registers, or due diligence documentation.

4. Circumventing Policy Controls

- Using agents, intermediaries, or third parties to make prohibited payments or arrangements on behalf of the company.
- Structuring transactions to conceal the identity of the payer or recipient in violation of this policy.

Important Notes

- This document forms part of the company's overall compliance requirements; violations may result in disciplinary action or legal consequences.
- Employees are encouraged to report any suspected or actual breaches, in confidence, to the Compliance Officer.
- This policy applies to all business activities in every geography where the company operates.
- When in doubt about conduct, seek guidance before taking any action.