

Training and Awareness Document

Anti-Bribery Policy

1. Purpose

The purpose of this document is to provide information and guidance to all employees regarding the company's Anti-Bribery Policy, and to raise awareness on the importance of compliance with anti-bribery laws and regulations.

2. Scope

This document applies to all employees, management, contractors, and third parties engaged with the company, across all locations and operations.

3. Policy Statement

The company has a zero-tolerance approach to bribery and corruption. All employees and associated persons must not, directly or indirectly, offer, give, solicit or accept any bribe or corrupt payment in any form.

4. Key Prohibitions

- No offering or accepting of bribes, kickbacks, or facilitation payments.
- No indirect or direct provision of anything of value intended to improperly influence business decisions.
- No concealment of payments or misrepresentation of expenses.
- No retaliation against employees who report concerns in good faith.

5. Responsibilities

- All employees must comply with the Anti-Bribery Policy and complete required training.
- Managers are responsible for promoting awareness and monitoring compliance within their teams.
- Suspected violations must be reported promptly to the Compliance Team or through designated channels.

6. Training and Awareness

- Mandatory anti-bribery training will be provided on an annual basis.
- Employees must acknowledge receipt and understanding of this policy.
- Additional resources and support are available from the Compliance Team.

7. Consequences of Non-Compliance

Breaches of the Anti-Bribery Policy may result in disciplinary action, up to and including termination of employment, and may also result in criminal prosecution.

Important Notes:

- Review and update this document regularly to align with evolving laws and best practices.
- Use clear and concise language to ensure understanding across all employee levels.
- Document all training sessions and employee acknowledgments for audit purposes.
- Emphasize a culture of integrity and ethical conduct at every training opportunity.

