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# **Anti-Bribery Policy**

In this document, I, we, our, us referred as DME.

You, your, their referred as instructing party, injured party, claimant.

### 1. Introduction

I am committed to conducting my business with integrity, transparency, and in compliance with all applicable laws and regulations. Bribery and corruption undermine these principles and are detrimental to my reputation, trust, and business ethics. Therefore, I have established this Anti-Bribery Policy to outline my zero-tolerance approach towards bribery and corruption in any form.

## 2. Scope

This policy applies to the DME engaged to provide services to instructing parties and injured parties.

# 3. Definition of Bribery

Bribery is the offering, giving, receiving, or soliciting of anything of value to influence the actions or decisions of an individual or organisation to gain a business advantage. This includes, but is not limited to, bribes, kickbacks, facilitation payments, and inappropriate gifts or hospitality.

#### 4. Compliance with Laws and Regulations

I am committed to complying with all applicable anti-bribery laws and regulations, including but not limited to the Bribery Act 2010 and any local laws or regulations governing anti-bribery and corruption.

# **5. Prohibited Conduct**

The following activities are strictly prohibited and will not be tolerated under any circumstances:

- Offering, giving, receiving, or soliciting bribes or other improper inducements, whether directly or indirectly, to or from any individual or organization.
- Engaging in facilitation payments or "grease payments" to expedite routine government actions or services.

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- Offering or accepting gifts, entertainment, or hospitality that could reasonably be perceived as intended to improperly influence business decisions or gain an unfair advantage.
- Making political contributions or donations that could be perceived as attempts to improperly influence government officials or political parties.

# 6. Responsibilities

The DME is responsible for:

- Familiarising themselves with the requirements of this policy and ensuring compliance with its provisions.
- Reporting any suspected or actual instances of bribery or corruption promptly to the DME.
- Cooperating fully with any internal or external investigations into allegations of bribery or corruption.

# 7. Gifts and Hospitality

The DME must exercise caution when giving or receiving gifts, entertainment, or hospitality. All such activities must be reasonable, proportionate, and in compliance with applicable laws and regulations. Any gifts or hospitality offered or received must be approved in advance and appropriately documented.

### 8. Training and Awareness

I regularly participate in the training and awareness programs to ensure understanding of my responsibilities and obligations regarding bribery and corruption prevention. The training cover topics such as recognising bribery risks, reporting procedures, and ethical decision-making.

# 9. Consequences of Non-Compliance

Violation of this policy may result in breach of my trust and agreement with the instructing parties and/or legal action, as well as civil or criminal penalties for individuals involved in bribery or corruption. The DME will fully cooperate with law enforcement authorities in investigating and prosecuting instances of bribery or corruption.

#### 10. Review and Revision

This policy will be reviewed periodically and updated as necessary to reflect changes in laws, regulations, and business practices. Amendments to the policy will be communicated where required, and appropriate training will be obtained.

#### 11. Conclusion

By adhering to the principles outlined in this Anti-Bribery Policy, the DME demonstrate commitment to conducting business with honesty, integrity, and respect for ethical standards. This contributes to a culture of transparency, trust, and accountability within our business operations.

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