

Anti-Bribery and Corruption Policy

Company has adopted the Anti-Bribery and Corruption policy to communicate its principles and to assist those working for the company to uphold it.

This policy also applies for the "third party" or "business associates" which means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Company's Anti-Bribery and Corruption policy:

- a. prohibits bribery / zero tolerance to bribery incidents.
- b. is in compliance with anti-bribery laws that are applicable to the organization.
- c. is appropriate to the purpose of the organization
- d. provides a framework for setting, reviewing and achieving anti-bribery objectives
- e. encourages raising concerns in confidence without fear of reprisal
- f. is available as documented information,
- g. is communicated within the organization and to business associates who pose more than a low risk of bribery,
- h. is available to interested parties, as appropriate,
- i. is reviewed at defined intervals and when significant changes occur for continuing suitability and improvement.
- j. allows anonymous reporting.
- k. will not tolerate retaliation in any form against anyone for raising concerns or reporting bribery incident. All reports will be treated confidentially.
- l. does not permit to make contributions to political parties. Company makes charitable donations that are legal and ethical under local laws and practices and that are in accordance with our Charity Policy and through our Corporate Social Responsibility policy and "Life Jacket Foundation" which is in force from time to time.
- m. Includes the development of Bribery Risk Assessment which identifies, assesses, prioritizes the bribery risks and evaluates the suitability and effectiveness of the organization's existing controls to mitigate the assessed bribery risks.
- n. Includes the due diligence procedure for company's employees and "third party" or "business associates" necessary to obtain sufficient information to assess the bribery risks.

In particular our employees,

- a. must never offer, promise or give a financial or other advantage to any person (including a foreign public official) with the intention of inducing or rewarding improper performance by them of their duties.
- b. must never directly or indirectly accept or agree to receive a financial or other advantage as a reward for the improper performance of his / her duties. It makes no difference whether the advantage is for the employee or a third party.
- c. Where their role requires this, they are permitted to give and receive gifts & hospitality (informing their line manager if they are unsure about this), but this should always be in a reasonable and proportionate manner.
- d. Are provided with specific guidance on how to avoid requests or demands for such payments and deal with them.