



ASZ Company FZCO Anti-Bribery and Conflict of Interest Program

ASZ Company FZCO is committed to conducting business with integrity, transparency, and in full compliance with all applicable laws. This Anti-Bribery and Conflict of Interest Program outlines our policies and procedures to prevent bribery, conflicts of interest, and unethical behavior within our operations. All employees, contractors, and business partners are expected to adhere to these guidelines.

1. Policy on Bribery and Gifts

- - Clearly prohibit offering, giving, or accepting bribes, gifts, or any other incentives to obtain business advantages.
- - Outline guidelines for acceptable gifts and entertainment, ensuring they remain nominal and cannot influence decision-making.
- - Require all employees to disclose any gift or entertainment offered, received, or declined in a gifts register.

2. Conflict of Interest Policy

- - Define conflict of interest situations, including personal relationships, outside financial interests, and involvement with competitors.
- - Require employees to declare any potential or actual conflicts of interest to their supervisors or HR.
- - Implement a process for managing disclosed conflicts to ensure impartiality in decisions.

3. Training and Awareness

- - Conduct regular anti-bribery and conflict of interest training, highlighting real-world scenarios and the consequences of unethical behavior.
- - Include training on legal and ethical obligations regarding bribes and how to avoid or handle conflicts of interest.

4. Monitoring and Reporting Mechanisms

- - Provide confidential channels (like a hotline or secure portal) for reporting suspected bribery or conflicts of interest.
- - Assign a compliance officer to investigate reports of bribery or conflict of interest and take appropriate action.