



## **ASZ Company FZCO Anti-Corruption, Anti-Extortion, and Anti-Embezzlement Program**

ASZ Company FZCO is committed to maintaining the highest standards of integrity and transparency in all business dealings. This program outlines our measures to prevent corruption, extortion, and embezzlement, emphasizing our commitment to ethical conduct across all operations. The following guidelines apply to all employees, contractors, and third-party partners associated with ASZ Company FZCO.

### **1. Code of Conduct and Ethics**

- - A comprehensive Code of Conduct outlines acceptable and unacceptable behaviors, emphasizing zero tolerance for corruption, extortion, and embezzlement.
- - The Code mandates ethical decision-making and includes examples of prohibited practices related to bribery, conflicts of interest, and misuse of company assets.

### **2. Training and Awareness**

- - All employees and contractors receive regular training on anti-corruption policies, including how to identify, avoid, and report unethical behavior.
- - Training includes case studies on corruption and scenarios highlighting the consequences of extortion and embezzlement.

### **3. Due Diligence**

- - Conduct thorough due diligence for all third-party partnerships, assessing their ethical practices, reputation, and compliance with anti-corruption laws.
- - ASZ requires all suppliers and partners to sign declarations affirming their adherence to anti-corruption standards.

### **4. Internal Controls and Audits**

- - Implement robust internal controls, including segregation of duties, authorization limits, and transparent approval processes to prevent unauthorized access or handling of funds.
- - Regular internal and external audits to detect discrepancies, ensuring proper documentation for transactions and contracts.

### **5. Reporting Mechanisms**

- - Establish confidential and anonymous channels (such as a hotline or online portal) for employees and partners to report suspected cases of corruption, extortion, or embezzlement without fear of retaliation.
- - Assign a compliance officer to investigate reports and take corrective action if needed.

## **6. Disciplinary Actions**

- - Clearly outline disciplinary procedures, including termination and legal action, for any employee or partner found guilty of corruption, extortion, or embezzlement.
- - Reinforce that ASZ maintains a zero-tolerance policy toward these violations.

## **7. Regular Program Evaluation**

- - Conduct regular reviews and updates to the program to align with current laws, industry standards, and best practices.
- - Encourage feedback from employees to identify gaps or areas needing improvement in anti-corruption efforts.