

Policy Name: Global Ethical Business & Anti-Bribery Policy

Version: 2.5

Last Updated: December 2023

1. Purpose

This policy ensures that all vendors and third-party partners maintain **high ethical business standards** and **comply with anti-bribery laws** such as the **FCPA (Foreign Corrupt Practices Act)** and **UK Bribery Act**.

2. Business Integrity & Anti-Corruption Measures

- Vendors must not **engage in bribery, kickbacks, or fraudulent practices** when dealing with company representatives.
- Any gift or entertainment exceeding **\$50 in value** must be disclosed and pre-approved by compliance officers.
- All vendor contracts must include a **mandatory anti-bribery and ethical conduct clause**.

3. Conflict of Interest Disclosure

- Vendors must **declare any existing relationships** with employees or board members.
- **Nepotism, favoritism, and biased procurement practices** are strictly prohibited.
- Vendors must provide a **conflict-of-interest statement** before contract approval.

4. Whistleblower Protection & Reporting

- Vendors must maintain **confidential reporting channels** for employees to report unethical behavior.
- Any violations of ethical business practices **must be reported within 7 days** to the corporate ethics board.
- Retaliation against whistleblowers will result in **blacklisting and contract termination**.

5. Compliance & Monitoring

- Vendors must complete **annual compliance training** on ethical business conduct.
- Random **third-party audits** may be conducted to ensure compliance.

- Non-compliance may lead to **financial penalties, contract cancellation, or legal action.**