# **Anti-Bribery and Corruption Policy**

**Global Engineering Works Anti-Bribery and Corruption Policy**

**Approved By: Muhammad Yaseen Khan, CEO & Director Technical**

## **Policy Statement**

Global Engineering Works, operating under Global NDT & Engineering Services, is committed to conducting all business activities with the highest standards of integrity, transparency, and ethical behavior. We have a zero-tolerance approach to bribery and corruption in any form. This policy ensures compliance with applicable anti-bribery and corruption laws, including international standards and local regulations in Pakistan. Led by our experienced leadership team, including CEO Muhammad Yaseen Khan with over 45 years in NDT and mechanical services, we prioritize ethical practices to maintain trust, safety, and client satisfaction across our services.

## **Objectives**

* To prevent, detect, and respond to any acts of bribery or corruption.
* To foster a culture of honesty and accountability among employees, contractors, and partners.
* To protect the company's reputation and ensure sustainable business operations.

## **Scope**

This policy applies to all employees, officers, directors, agents, contractors, suppliers, and business partners involved in our operations. It covers all services, including scaffolding, insulation & cladding, ducting (cold & hot), mechanical engineering works, surface preparation (sand blasting, grid blasting), painting, maintenance & welding (structures, piping, vessels, rotary equipment), civil engineering works, NDT & inspection services, manpower supply, and general material supply. It extends to all interactions, such as project bidding, procurement, client engagements, and material sourcing.

## **Key Principles**

### **1. Prohibition of Bribery and Corruption**

* Bribery: Offering, giving, receiving, or soliciting anything of value to influence actions or decisions is strictly prohibited.
* Corruption: Any abuse of power for personal gain, including facilitation payments, kickbacks, or conflicts of interest, is not tolerated.
* Gifts and Hospitality: Only modest, reasonable gifts or hospitality may be accepted or offered, subject to pre-approval and documentation. Anything exceeding nominal value must be reported.

### **2. Risk Assessment and Due Diligence**

* Regular risk assessments for high-risk areas, such as procurement of materials (e.g., scaffolding components, insulation products) and manpower supply.
* Due diligence on third parties, including suppliers and contractors, to ensure they adhere to anti-corruption standards.
* Oversight by PEC-registered consultant Engr. Anwar Khan to align with engineering and ethical compliance.

### **3. Training and Awareness**

* Mandatory annual training for all staff, including certified personnel like scaffolders, insulators, and mechanics, on recognizing and reporting bribery risks.
* Integration into onboarding processes managed by Muhammad Navaid Akhtar, General Manager.

### **4. Reporting and Investigation**

* Confidential Reporting: Employees are encouraged to report suspicions via anonymous channels, such as the whistleblower hotline (+92313-2418284) or email (whistleblower@globalengineeringworks.net).
* Investigations: Prompt, impartial investigations led by the CEO or designated committee, with appropriate disciplinary actions for violations.
* Non-Retaliation: Protection for good-faith reporters, aligning with our whistleblower policy.

### **5. Monitoring and Compliance**

* Internal audits conducted quarterly to review financial transactions, contracts, and project executions.
* Record-Keeping: All business dealings documented and retained for at least 7 years, managed by Muhammad Younieb Khan, Manager Technical.
* Continuous Improvement: Annual policy reviews based on legal changes and feedback.

## **Responsibilities**

* CEO (Muhammad Yaseen Khan): Overall accountability for policy enforcement and ethical leadership.
* General Manager (Muhammad Navaid Akhtar): Day-to-day implementation and training oversight.
* Manager Administration (Muhammad Mohib Khan): Handling reports and compliance documentation.
* All Employees and Partners: Comply with the policy and report any concerns promptly.

Global Engineering Works is dedicated to ethical excellence, ensuring our services drive industrial progress without compromise. Violations may result in termination, legal action, or reporting to authorities. For inquiries or reports, contact: globalengineeringworks25@gmail.com or A-127, Block #12, Gulistan-e-Johar, Karachi.