

# Code of Ethics and Standards of Business Conduct: Anti-Corruption

## 1. Purpose

This Code establishes ethical standards and business conduct guidelines to prevent, detect, and address corruption and bribery. It applies to all employees, officers, directors, contractors, and business partners.

## 2. Scope

This policy applies globally to all operations, subsidiaries, affiliates, third parties, and anyone acting on behalf of the organization.

## 3. Core Principles

### 3.1 Zero Tolerance for Corruption

We prohibit all forms of bribery and corruption. No employee or representative shall offer, give, solicit, or receive any bribe, kickback, or illicit advantage to or from any individual, organization, or government official.

### 3.2 Compliance with Laws

All activities must comply with applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA).

### 3.3 Gifts and Hospitality

Gifts, entertainment, or hospitality must not be used to improperly influence decisions. All such offerings must be reasonable, infrequent, and transparent.

### 3.4 Third-Party Due Diligence

Third-party agents, suppliers, and contractors must be vetted for corruption risk and are required to adhere to this Code.

## 4. Contractual Terms Addressing Corruption Risk

All drafted contracts shall include the following anti-corruption clauses or something substantially similar:

### 4.1 Anti-Corruption Clause

"The Parties shall comply with all applicable anti-bribery and anti-corruption laws. Neither Party shall engage in any activity, practice, or conduct that would constitute an offense under such laws."

### 4.2 Termination for Breach

"Violation of any anti-corruption law or breach of this clause shall constitute a material breach, entitling the non-breaching Party to terminate the agreement with immediate effect."

### 4.3 Mandatory Reporting

"The Parties shall promptly report any suspected or actual corruption or unethical conduct related to this agreement."

## 5. Reporting and Disclosure Function

### 5.1 Internal Reporting Mechanism

Employees and stakeholders are encouraged to report concerns through the following confidential channel:

Online Portal: [Security Team – Suspicious Activity Intake](#)

Reports may be made anonymously and will be treated confidentially.

## Code of Ethics and Standards of Business Conduct: Anti-Corruption

### 52 Protection from Retaliation

We prohibit retaliation against any individual who reports a concern in good faith.

### 53 Compliance Monitoring

The Human Resource Department shall:

Regularly review and update the anti-corruption program.

Conduct training and awareness programs.

Perform risk assessments and compliance audits. Investigate reported incidents and ensure remediation.

### 6. Accountability and Disciplinary Action

Violations of this Code may result in disciplinary action, including termination of employment or business relationships, and referral to law enforcement authorities where appropriate.

### 7. Training and Certification

All employees and relevant third parties must complete annual anti-corruption training and certify adherence to this Code.