



Anti Bribery & Corruption Policy

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As a Company, Al-Konda Company maintains relationships with many different organizations in its supply chain, as well as directly employing large numbers of people. Al-Konda Company has a zero-tolerance approach to corruption. This zero tolerance approach also means we are committed to the mitigation, deterrence and detection of bribery and corruption. We do not and will not pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we accept bribes or improper inducements or anything that could be perceived as such and expect the same from our clients.

Our zero tolerance principles to bribery and corruption also apply to third parties with whom AL-KONDA does business or who are retained by us to perform services or deliver business for and on behalf of AL-KONDA.



Thaeir Konda
Chief Executive Officer



1. PURPOSE OF THIS POLICY:

1.1 The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2. Definition of bribery :

2.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

2.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

2.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

2.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

3. What is and what is NOT acceptable:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.



4. AL-KONDA Values:

We are honest

We are prudent

We are responsible

5. Employee Responsibilities

5.1 As an employee of AL-KONDA, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

5.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

5.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

5.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. AL-KONDA has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.



6. Monitoring and reviewing

6.1 AL-KONDA's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

6.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

6.3 Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

