



ANTI- BRIBERY POLICY

PURPOSE & LINK TO INTEGRITY

An Anti-Bribery & Corruption Policy is a set of guidelines and procedures designed to prevent bribery and corruption within an organization. The policy is put in place to ensure that all employees and associates of the organization are aware of their responsibilities to uphold ethical behavior and avoid any activities that could lead to corruption.

Improving the work environment and conditions contributes greatly to the employees' motivation, and subsequently to their performance.

Working environment is one of the nonfinancial factors affecting morale and motivation. Employees who are satisfied with their work environment will more likely comply with the organisation's rules and interests. As they strive to keep their position, they will prefer to put their personal interests behind the organisation' and refrain from dishonest behaviour such as fraud, embezzlement, accepting bribes, engaging in corrupt activities, or theft.

We as an employer, make sure that both our business and our employees are healthy and efficient. Staying in business and ensuring longevity means caring for the people in the office and ensuring that we can stay happy while still getting their work done.

Scope

This policy applies to all Hirexa employees globally.

Definitions

The policy defines key terms such as bribery, corruption, and facilitation payments, to ensure that everyone understands what is meant by these terms.

Due diligence

The policy requires that the organization conduct due diligence on third-party partners and associates to ensure that they are not involved in any corrupt activities.

Reporting and whistleblowing

The policy encourages employees to report any suspected bribery or corruption and provides a confidential reporting channel for whistleblowers.

The policy also includes the following elements:

- *Commitment to compliance: The policy sets out the organization's commitment to compliance with anti-bribery and corruption laws and regulations.*
- *Prohibition of bribery and corruption: The policy clearly prohibits any form of bribery or corruption, including both giving and receiving bribes.*
- *Gifts, hospitality, and expenses: The policy provides guidance on how to handle gifts, hospitality, and expenses to avoid any perception of impropriety.*
- *Consequences of non-compliance: The policy outlines the consequences of non-compliance with the policy, which may include disciplinary action, termination of employment, and legal action.*

An Anti-Bribery & Corruption Policy is an essential component of any organization's compliance program, as it helps to prevent unethical behavior and protects the organization's reputation.

Conflicts Of Interest

Employees have an obligation to conduct business within a timeline that prohibits actual or potential conflicts of interest. This policy establishes only the framework within which HIREXA wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees seek further clarification on issues related to the subject of acceptable standards of operation.

The transaction with an outside firm must be conducted within the framework established and controlled by the Director Level of HIREXA. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes; product bonuses, special fringe benefits, unusual price breaks, and other windfalls. Promotional plans that could be interpreted to involve unusual gain require specific director-level approval.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or a far of relative because of HIREXA business dealings. For the purpose of this policy, a relative is any person whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence or transactions involving purchases, contracts, or leases, it is imperative that they disclose to the Director of HIREXA as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Bribery

Bribery includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value - providing lavish/inappropriate gifts, hospitality and entertainment, inside information, or sexual or other favours; offering employment to a relative; underwriting travel expenses; abuse of function; or other significant favours. Bribery includes advantages provided directly, as well as indirectly through an intermediary. CoC and this ABAC Policy prohibits Designated Persons from giving bribes not only to any public/government official but also to any private individual. Bribery in any form will not be tolerated.