

Anti-Bribery Policy® (ABP)

Policy Summary:

ACERTA Certification & Inspection Private Limited (ACI) is the premium Certification body. ACI is committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption. This Anti-Bribery Policy® (“ABP”) (“Policy”) prohibits bribery of government officials as well as private sector (commercial) bribery, including the offering, promising, authorizing or providing anything of value to any client, business partner, vendor or other third party in order to encourage or reward the improper performance of an activity connected with our business. Violation of this Policy could result in disciplinary actions including, but not limited to, termination of the contract. It is therefore vital that the entire team of ACI, not only understand and appreciate the importance of this Policy, but also comply with it in their daily work.

1. Purpose and Goals of policy: This Policy is intended to outline ACI’s risks related to bribery and corruption, to highlight ACI team member’s responsibilities under *ACI Anti-Bribery Policy®* and to provide them with the tools and support necessary to identify and combat those anti-corruption risks.

2. Risks and/or consequences of non-compliance: A violation of government anti-corruption laws can lead to severe civil and criminal penalties and reputational harm to ACI. And our company employees that violate these laws can also face severe civil and criminal penalties. Bribery is also strictly prohibited by the religion Islam with strict punishment from God Almighty. Therefore, the prohibition against bribery is incorporated into ACI policy framework and a violation of this Policy could also result in serious disciplinary actions, including, but not limited to, termination of contract.

3. Scope and Range of application: ACI expects all employees, officers, directors, and third parties working on its behalf to refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile, or location.

4. Policy details:

4.1. Applicable Laws – ACI team members must abide by *ACI Anti-Bribery Policy®* and all applicable Anti-Bribery laws in every country in which ACI does business (for example, federal, regional, provincial, and state laws). Virtually every country in which ACI operate, prohibits bribery. These laws generally prohibit both bribery of government officials and private sector (commercial) bribery.

4.2. Prohibition of Bribery:

4.2.1. Government Bribery – ACI team members are prohibited from giving, promising, offering, or authorizing payment of anything of value, to any government official, to obtain or retain business, to secure some other improper advantage, or to improperly influence a government official’s

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actions. Additionally, ACI team members must also avoid the appearance of improper interactions with government officials.

4.2.2. Commercial Bribery - In addition to the prohibitions of bribing government officials discussed above, ACI prohibits its team members from offering or providing corrupt payments and other advantages in kind (gift or facilitations) to its clients or any private (non-government) persons and entities or accepting the same from its clients or any private (non-government) persons and entities, during the audits or later as well. Such payments constitute commercial bribery or “kickbacks” and are strictly prohibited by ACI.

4.2.3. Facilitation Payments - Generally, facilitation payments are prohibited by this Policy, except for a very limited set of circumstances, in which, prior written approval must be obtained from ACI CEO/Directors.

4.3. Providing Items of Value to Government Officials:

4.3.1. Government Gifts (GIFT/ PRESENT) - Before providing an item of value / gift, to any government official or commercial partners or any private entity, when it might be appropriate to provide the same, ACI team members must first obtain prior written approval from ACI CEO / Directors.

4.3.2. Gifts, Meals, Travel and Entertainment - It is not permissible to provide or obtain gifts, meals, travel, or entertainment to/from anyone (government officials or commercial partners or any private entity) in exchange for any improper favor or benefit. In addition, gifts of cash or cash equivalents, such as gift cards, are also not permissible.

4.3.3. Donations – ACI team member are not allowed to provide/accept a donation to/from improperly influence any government official or commercial partner or any private person, or in exchange for any improper favor or benefit. However, as part of a charitable effort, it may be permissible to make donations directly to any government institution or a private entity (rather than to an individual government official or private person). Prior approval is required from ACI CEO / Directors, before making such a donation.

4.3.4. Promoting, Demonstrating, or Explaining Products – ACI team members are not allowed to make any promotional expenses or activities to any government official or commercial partners or any private entity, to improperly influence him or her, or in exchange for any personal favor or benefit. However, as part of ACI marketing efforts, it may be appropriate to make such expenses to a government official or a private entity, only to promote or explain ACI’s products and services. Before doing so, ACI team members must seek prior approval from ACI CEO / Directors.

4.3.5. Hiring or Engaging Government Officials - It is never permissible for ACI team members, to hire or engage a government official, or his or her immediate family members, to improperly influence the official, or in exchange for any improper favor or benefit. Note that before hiring a government official (or relative thereof) ACI team members must first receive approval from ACI CEO / Directors.

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4.3.6. Political Contributions - ACI team members are prohibited to make any political contribution to improperly influence any government official or commercial partners or any private entity, or in exchange for any improper favor or benefit.

4.4. Third-Party Management:

4.4.1. Applicability to Third Parties - Third-party agents, sub-contractors or any other third-party representatives acting for or on behalf of ACI, are prohibited from making corrupt payments on ACI behalf. This prohibition also applies to subcontractors hired by third parties to perform work on ACI's behalf. Any and all payments made by ACI to all third parties, including commissions, compensation, reimbursements, must be official and reasonable in relation to the services provided to ACI and accurately documented in ACI financial books and records. These payments must not be made in cash or to bank accounts that are not in the third party's name, without prior written approval from ACI CEO / Directors.

4.5. Mandatory Policy - ACI requires that all permanent and temporary team members of ACI, including the interneers, must strictly adhere to the *ACI Anti-Bribery Policy®* and so everyone must read, understand and sign this *ACI Anti-Bribery Policy®* document, the record of which, must be kept in ACI office record. ACI also requires that all its clients and subcontractors and other third-party vendors must also strictly adhere to the *ACI Anti-Bribery Policy®* and so everyone must read, understand and sign this *ACI Anti-Bribery Policy®* document, the record of which, must be kept in ACI office record.

4.6. Reporting Violations - If any ACI team member or any government official or commercial partners or any private entity or ACI clients or a member of public, observe any conduct or have information, that may violate *ACI Anti-Bribery Policy®*, they are requested to inform ACI CEO / Directors via email ceo@acerta-certification.com or by phone call or WhatsApp on +92-322 657 0410 or in writing, by courier to the office address found on the ACI website. Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action. Any such reporting will be treated as confidential to the extent permitted by law. ACI strictly prohibits retaliation for good faith reports of suspected misconduct. Failure of an ACI team member, to report a violation of *ACI Anti-Bribery Policy®*, may constitutes an independent violation of this Policy, that is subject to discipline, up to and including termination of employment.

**TO BE SIGNED BY ALL ACI TEAM MEMBERS AND ALL ACI EXTERNAL AUDITORS & STAFF,
SUB-CONTRACTORS OR OTHER THIRD-PARTY REPRESENTATIVES**

I have read the complete *ACI Anti-Bribery Policy®* document. I understand it and accept it without any influence or force and confirm to follow the same.

Name: _____

Company: _____

Designation: _____

Date: _____



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Sign: _____