



مجموعة الفردان  
Alfardan Group

# ANTI-CORRUPTION & ANTI-BRIBERY POLICY

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## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### 1. INTRODUCTION

The Alfardan Group (its affiliates and subsidiaries) (together the "Alfardan Group") hereby formalizes its new policy on the anti-bribery and anti-corruption. This Anti-Bribery & Anti-Corruption Policy (the "Policy") will supersede any other existing policies relating to bribery and corruption.

### 2. POLICY STATEMENT

It is Alfardan Group's policy to conduct all of its business in an honest and ethical manner. Alfardan Group takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. It is the goal of Alfardan Group to avoid acts which might reflect adversely upon the integrity and reputation of the Group.

Individuals involved in corrupt activity may be fined, terminated and/or reported to local law enforcement authorities. Alfardan Group, therefore takes its legal and ethical responsibilities very seriously and is committed to upholding all laws relevant to countering bribery and corruption in each of the jurisdictions in which it operates.

The purpose of this Policy is to:

- establish the principles with respect to applicable Anti-Bribery and Anti-Corruption laws and regulations;
- set out the responsibilities of Alfardan Group, and all its employees and representatives in observing and upholding the Group's position on bribery and corruption, and preventing the Group's involvement in any activity relating to bribery or corruption; and
- provide information and guidance to those employees and representatives on how to recognize and deal with bribery and corruption issues.

In this policy:

**"Third party"** means any individual or organization with whom you may come into contact during the course of your work for Alfardan Group, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

“**Representatives**” means respective directors, officers, employees, personnel, agents, partners of the Group, or even contractors of the Group, when acting on behalf of the Group or representing the interests of the Group.

### 3. APPLICATION OF THE POLICY

This Policy applies to all employees, representatives and contractors of Alfardan Group. Compliance with this Policy constitutes terms of service for each director, conditions of employment for each employee and representative, and conditions of providing services to Alfardan Group for each contractor. Each such person agrees to be bound by the provisions of this Policy upon notification of the most recent copy being given to them or upon notification that an updated version has been placed on Alfardan Group's website or online portal.

This Policy extends across all of the Group's business dealings and in all countries and territories in which the Group operates. All persons covered by this Policy, in discharging their duties on behalf of Alfardan, are required to comply with the laws, rules and regulations applicable in the location in which Alfardan Group is performing business activities, and in particular with respect to anti-bribery and corruption laws, rules and regulations. Where uncertainty or ambiguity exists, please contact audit and/or legal department.

### 4. FORMS OF BRIBERY AND CORRUPTION

For purposes of this Policy, each of the scenarios below is referred to as a “bribery offence”.

#### **Bribes**

- A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or business or personal advantage.
- An inducement is something which helps to bring about an action or desired result.
- A business advantage means that Alfardan Group is placed in a better position (financially, economically, or reputationally, or in any other way which is beneficial) either than it would otherwise have been had the bribery or corruption not taken place.

- Kickbacks are payment of any portion of a contract made to employees of another contracting party or the utilization of other techniques, such as subcontracts, purchase orders or consulting agreements, to channel payment to public officials, political parties, party officials or political candidates, to employees of another contracting party, or their relatives or business associates.
- Extortion means to directly or indirectly demand or accept a bribe, facilitation payment or kickback.
- Tax evasion means intentionally not adhering to tax laws and regulations to avoid paying taxes in full or in part. Tax is defined as any sort of payment obligation to a government entity which is mandated by applicable laws as a result of engaging in business transactions. Tax can be but not limited to stamp duties, customs, VAT, sales tax, corporate income tax, capital gain and withholding tax.

## 5. ANTI-BRIBERY AND CORRUPTION STANDARDS

It is prohibited for any Business Unit of the Alfardan Group or its employees, representatives or contractors to:

- a) give, promise to give, or offer, a payment, gift or hospitality to a third party or otherwise engage in or permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given.
- b) give, promise to give, or offer, a payment, gift or hospitality to a third party to "facilitate" or expedite a routine procedure.
- c) accept a payment, gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Business Unit or the employee in return.
- d) threaten or retaliate against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this Policy or under the Alfardan Group Code of Conduct.
- e) engage in any activity that might lead to a breach of this Policy.

Non-compliance with the Policy may result in criminal or civil penalties in accordance with local applicable laws and will vary according to the offence. An employee acting in contravention of the Policy will also face disciplinary action up to and including termination of employment.

## 6. GIFTS AND HOSPITALITY

This Policy does not prohibit normal and appropriate hospitality (given or received) during the course of normal business, to or from third parties. However, if you are unsure of whether a gift or hospitality given or received during the course is inappropriate or not, you should consult with Alfardan Group's audit and/or legal department.

A "gift" includes anything of value , transferred to another, for which no specific services or compensation is received or expected. "Hospitality" or business entertainment includes the act of dining or participating in a recreational or related activity.

### General Principles

Alfardan Group is committed both to the course of highest integrity and to avoiding even the appearance of impropriety in the conduct of its affairs. These commitments have obvious significance for the bestowing favors upon individuals, whether in the public or private sector, who are in the position, directly or indirectly, to benefit the Alfardan Group.

The Group's business interests are best served when its relationships are free of influences such as gift-giving or receiving. Only in this way can the Group sustain constructive ongoing relationships with those doing business or seeking to do business with the Group. Therefore, the Group discourages the practice of giving or receiving gifts. It is, however, recognized that doing away entirely with the giving or receiving of gifts is not practical and hence occasional low values exchanges of gifts may be permissible. Obviously, good business judgement must be exercised in all such cases.

### Alfardan Group's Policy in Respect of Gifts

- Gifts of cash on the Group's behalf are strictly prohibited.
- Exchange of non-cash gifts will be moderate, infrequent and appropriate to the occasion, for instance customary exchange of small gifts given during religious holidays.
- The above will be in line with the Group's conflict of interest policies and Code of Conduct, will reflect good business judgement and will comply with the applicable laws.

- Giving and receiving of gifts in the form of commissions, abnormal loans, shares in profit, free travel tickets or hotel / other accommodation, membership in social clubs / health facilities at no charge or at unreasonably low charge, repairs and improvements at unreasonably low prices, and such other facilities are strictly prohibited.

The giving or receipt of gifts may not be prohibited, if the following requirements are met:

- It is not made with the intention of influencing a third to obtain or retain business or a business advantage, or to reward the provision or retention business or a business advantage, or in explicit or implicit.
- It complies with local law;
- It does not include cash or a cash equivalent;
- It is appropriate in the circumstances. For example, in the State of Qatar it is customary for small gifts to be given at Ramadan time or Eid Fitr and Eid Adha;
- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- It is given openly, not secretly; and
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the audit and/or legal department.

The test to be applied is whether in all the circumstances the gift of hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

## **7. DONATIONS AND MEMBERSHIPS**

The Group has a policy of strict political neutrality; it does not make donations to any political parties, organizations, or individuals engaged in politics.

Alfardan Group only makes charitable donations to authorized charitable foundations that are legally established under the local laws. No donation must be offered or made without the prior approval of the Chief Executive Officer.

## **8. MERGERS AND ACQUISITIONS**

The Group shall undertake appropriate and reasonable due diligence on the reputation and integrity of any business in which it makes investments or any entity with which it intends to form a partnership or joint venture.

## **9. DISCOUNT AND ALLOWANCES**

The valid discount, fleet, affinity, government and corporate schemes, which are continuously revised and updated based on the market dynamics and needs, should prevail. Further discounts beyond those pre-specified schemes should be approved as per applicable and approved Delegation of Authority as well as properly reported as per this Policy.

## **10. SPONSORING**

Sponsoring activities should remain within the scope of promoting the product(s) or service(s), the brand(s), Corporate Social Responsibility (CSR) activities and/or initiatives with similar nature away from obtaining and/or retaining improper advantage or a preferential treatment.

## **11. RESPONSIBILITIES UNDER THE POLICY**

On need basis and in coordination with the HR Department, all employees and representatives, contractors and suppliers of Alfardan Group must participate in training programs provided by the Group and comply with this Policy and the following related policies:

- a) Code of Conduct;
- b) Whistle Blowing Policy; and
- c) Gifts & Hospitality Policy

The prevention, detection and reporting of bribery offences and other forms of corruption are the responsibility of all those working for Alfardan Group or under its control. All such persons are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

If you are asked to make a payment on the Group's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a



payment, you should raise these with the audit and/or legal department, wherever possible, prior to taking any action.

You must report using the form at the end of this document as soon as possible if you believe or suspect that an action in conflict with this Policy has occurred, or may occur in the future, or has been solicited by any person.

## 12. RECORD-KEEPING

All Business Units are expected to:

- keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- have in place internal controls and procedures that fit these criteria and enhance compliance with this Policy.
- prepare and maintain all accounts, invoices, memoranda and other documents and records relating to dealings with third parties with strict accuracy and completeness. No accounts or cash funds may be kept "off-book" to facilitate or conceal improper payments. The use of false documents and invoices is prohibited, as is the making of inadequate, ambiguous or deceptive bookkeeping entries and any other accounting procedure, technique or device that would hide or otherwise disguise illegal payments.
- ensure the effectiveness of internal controls, business and finance personnel of the Group will review transactions and expense / payment requests for warning signs that signal an inadequate commercial basis or present excessive risks.

## 13. REPORTING VIOLATIONS OF THIS POLICY

All employees, representatives and contractors must adhere to Alfardan Group's commitment to conduct its business and affairs in a lawful and ethical manner and are encouraged to raise any queries with the audit and/or legal department.

In addition, any employee, representative and contractor of Alfardan Group who becomes aware of any instance where Alfardan Group receives a solicitation to engage in any act prohibited by this Policy, or who becomes aware of any information suggesting that a violation of this Policy has occurred or is about to occur is required to report it using the form at the end of this document.

Persons who refuse to engage in or permit a bribery offence, or who

raise legal or ethical concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Alfardan Group aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. No employees, representatives and contractors of Alfardan Group will suffer demotion, penalty, or other adverse consequences for refusing to engage in or permit a bribery offence or for raising concerns or for reporting possible wrongdoing.

Alfardan Group prohibits retaliatory action against any person who raises concern in good faith.

#### **14. COMMUNICATION OF THIS POLICY**

To ensure that all employees, representatives and contractors of Alfardan Group are aware of the Policy, a copy of the Policy will be provided to them and they will be advised that the Policy is available on Alfardan Group's website for their review. All employees, representatives and contractors of Alfardan Group will be informed whenever significant changes are made. New employees, representatives and contractors of Alfardan Group will be provided with a copy of this Policy and will be educated about its importance.

Training on this Policy will form part of the induction process for all new employees, representatives and contractors of Alfardan Group. All existing employees, representatives and contractors will receive relevant training on how to implement and adhere to this Policy.

Alfardan Group's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

#### **15. MONITORING AND REVIEW**

The audit and/or legal department will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. Any deficiencies identified will be rectified as soon as possible.

Internal control systems and procedures will be subject to audits to provide assurance that they are effective in countering bribery and corruption.

All employees, representatives and contractors of Alfardan Group are responsible for the success of this Policy and should ensure they follow the procedures set out herein to disclose any suspected wrongdoing.

## 16. PENALTY AND SANCTIONS

Violations of this Policy, the Qatari Penal Code and/or any applicable laws and regulations pertaining to anti-corruption and bribery may result in severe consequences, which could include internal disciplinary action or termination of employment or contractual agreements without notice.

If it appears in the opinion of the Group that any employee, representative or contractor of Alfardan Group may have violated such laws, then Alfardan Group may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for the responsible person. Alfardan Group will not pay fines or penalties assessed against employees for the violation of Qatari Penal Code and anti-corruption and bribery laws.

Employees, representative and contractors of the Alfardan Group should understand that any violations of this Policy may result in severe fines, imprisonment and other sanctions, such as debarment from government contracting, damage to reputation and legal expense for the Alfardan Group.

## 17. ACKNOWLEDGEMENT

I (insert name) \_\_\_\_\_ acknowledge that I have read, understood and agreed to comply with the Anti-Bribery & Anti-Corruption Policy. I have not violated the provisions of this Policy and am not aware of any violations of the Policy as of the date hereof.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Gifts & Bonus given to employees by Alfardan Group during their employment and as part of other applicable policies and procedures are excluded from this policy.

## 18. REPORTING

You can report a complaint or incident related to any Business Unit of Alfardan Group by filling an online form.

Alfardan Group takes your concerns seriously, however, we expect that this reporting mechanism shall not be misused to make any frivolous or unsubstantiated complaints and/or reports.

To submit a complaint, please click on the relevant Business Unit below:

**Alfardan  
Group**

**Alfardan  
Jewellery**

**Alfardan  
Exchange**

**Alfardan  
Properties &  
Hospitality**

**Alfardan  
Automotive**

**Alfardan  
Investment**

**Alfardan  
Marine  
Services**

**Alfardan  
Medical**

**Alfardan  
Agriculture /  
Wahat Shafalahia  
& Safwa**