



1. The purpose of the Anti-Bribery and Corruption Policy

- The Company's anti-bribery and corruption policy is to conduct business with the company's clients in an honest way and in accordance with ethical standards. The company has zero tolerance towards bribery and corruption, and we are determined to act professionally, honestly and with integrity in all our business relationships. This policy has been implemented in the company's business turnover, posted on the company's website www.sdci.com, reference to this policy is provided in Contracts with existing partners.
- The purpose of the Policy is to support all laws related to combating bribery and corruption. At the same time, we are still obliged to comply with UK laws, including the Bribery Act of 2010 regarding our conduct both in our country and abroad, we understand and comply with anti-corruption laws (the US Law on Corruption Abroad, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business and other local anti-corruption or bribery laws)
- The Company conducts business only with those individuals and organizations that have a reliable reputation. Therefore, prior to establishing relations with business partners, a proper preliminary comprehensive legal review of counterparties is carried out and adequate protective measures are provided for the company.
- Bribery and corruption are punishable for individuals up to ten years in prison if the terms of this policy are violated, an unlimited fine may be applied. We also reserve the right to exclude partners from business turnover in case of violation and non-compliance with the terms of this policy. Therefore, we take legal responsibility very seriously, and insist on a serious attitude to legal responsibility on the part of partners.
- In this policy, a third party is any individual or organization with whom we are in contact in the course of work, and includes real and potential customers, buyers, suppliers, distributors, business contacts, agents, consultants, government and public authorities, including their advisers, representatives and officials individuals, politicians and political parties.

2. Bribery

- Bribery is incentives or rewards offered, promised or provided for the purpose of obtaining any commercial, contractual, regulatory or personal benefit.
- It is a crime for an employee of the company to accept such an offer. Accepting an offer is a crime, as it is obtaining personal gain.

3. Gifts and hospitality signs

- This policy does not prohibit normal and appropriate hospitality (provided and received) to or from third parties.
- The transfer or receipt of gifts is not prohibited if the following conditions are met:
 - ❖ this is not done for the purpose of influencing a third party to obtain or retain business or business benefits, or remuneration for the provision or preservation of business or business benefits, or as an explicit or implicit exchange for benefits;
 - ❖ it complies with local laws;
 - ❖ this is addressed to the company;
 - ❖ this does not include cash or cash equivalents (e.g. gift certificates or vouchers);
 - ❖ it is appropriate to the circumstances. For example, in the UK, it is customary to give small gifts for Christmas the reasons for the gift, the correspondence of its type, value and time of transmission should be taken into account;
 - ❖ it is transmitted openly, not secretly;
- The Company understands that the practice of providing business gifts varies between countries and regions, and what may be normal in one region may not be acceptable in another. Verification should be carried out under any circumstances, even if a gift or a sign of hospitality is reasonable and justified. The intentions of giving a gift should always be considered.

4. What is unacceptable?

- This is unacceptable for the Company, as well as for the partners (or for a person acting on behalf of the company, or on behalf of the partners):
 - ❖ to give, promise, or offer payment, a gift, or a token of hospitality with the expectation or hope that business benefits will be received, or to reward someone with benefits that have already been provided;
 - ❖ to give, promise or offer payment, gift or hospitality to government employees, agents or representatives in order to "facilitate" or speed up a routine procedure;

- ❖ accept payments from third parties if the Company knows or suspects that money is offered with the hope that they will gain an advantage in business;
- ❖ accept a gift or a token of hospitality from a third party if you know or suspect that it is offered or provided with the expectation that business benefits will be provided by us in exchange;
- ❖ threaten or retaliate against another employee who refused to commit bribery or who expressed concerns under this policy;
- ❖ take part in any activity that may lead to a violation of this policy.

5. Remuneration for simplification of payments and "kickbacks"

- The Company does not make and does not accept "assistance payments" or "kickbacks" of any kind. Simplification of payments is, as a rule, small informal payments made to ensure or accelerate routine actions.
- "Kickbacks" are, as a rule, payments in exchange for a business benefit or advantage. All employees should avoid any activity that may lead to the fact that the payment for simplification of formalities or "rollback" will be carried out or accepted by us.

6. Donations

- The Company does not make donations to political parties. The Company may make charitable donations that are legal and ethical according to local laws and practices. No donations should be offered or arranged without the prior approval of the Supervisor.

7. Responsibilities

- The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of everyone who works for the Company or under the control of the Company. All employees are required to avoid any actions that may lead to a violation of this policy.
- In the event of such a circumstance, this should be immediately reported as soon as possible, if there is a certainty or suspicion that a conflict with this policy has occurred or may occur in the future. For example, if a partner or potential partner, in order to gain an advantage in business with a Company, offers a deal, referring to a gift or money needed to ensure their activities. The following are the "warning signs" that may indicate bribery or corruption outlined in the Policy.

8. Protection

- The company's management guarantees that no person will suffer as a result of refusing to participate in bribery or corruption, or because of their suspicions that actual or potential bribery or other corruption crimes have occurred or may occur in the future. Corrective punishments include dismissal, disciplinary measures, threats or other adverse measures.

9. Potential risk scenario: "warning signs"


- Below is a list of possible "warning signs" that may arise in the course of work or partnership and which may cause concern in various anti-corruption laws. This list is not exhaustive and is provided for illustrative purposes only.
 - ❖ you have become aware that a third party is engaged in or has been accused of engaging in illegal business practices;
 - ❖ you will learn that a third party is suspected of giving or receiving a bribe, or is known for a "special relationship" with foreign government officials;
 - ❖ a third party insists on transferring commissions or collecting payment before signing a contract to conclude a contract or to perform government functions for us;
 - ❖ a third party demands payment in cash and/or refuses to sign a formal commission agreement or agreement or requires the provision of an invoice or payment receipt;
 - ❖ the third party requires that the payment be made to a country or geographical location other than the location where the third party resides or conducts business;
 - ❖ a third party requires an unexpected additional fee or commission to "simplify" the service;
 - ❖ a third party requires entertainment or gifts prior to the start or continuation of contract negotiations or the provision of services;
 - ❖ a third party demands payment for "ignoring" potential violations of the law;
 - ❖ a third party requires you to provide a position or other benefits for a friend or relative;
 - ❖ you receive an invoice from a third party that appears to be non-standard or custom-made;
 - ❖ the third party insists on using additional agreements or the party refuses to accept the terms agreed in writing;
 - ❖ have you noticed that we have been issued an invoice for commissions or fees, a payment that indicates more than is due for this service;
 - ❖ a third party requires the use of an agent, intermediary, consultant, distributor or supplier that is not normally used or that we do not know;
 - ❖ you are offered an unusually generous gift or generous signs of hospitality from third parties.
- If you encounter any of these "warning signs" while working with us, you must report them to any employee or other associate who has a credible concern about the issues covered in the above areas of application of the Policy, you should report such concern as soon as reasonably possible. At

the same time, it is important to ensure that such concerns are expressed in good faith, reliably and without malicious intent. However, you are not expected to investigate the issue.


- The Company recognizes that it is important to increase confidence in the initiative information line so that employees and other associates can be sure that their messages will be properly considered and appropriate response measures will be taken. In this regard, all associated persons are given the opportunity to express their concerns to an independent third party, including on a confidential or, moreover, on an anonymous basis. Such messages can be sent 24 hours a day, 7 days a week by e-mail- compliance@sdcit.com . This means of communication is secure and protected by special coding devices. The data of the external operator is reported regularly by; - Corporate website; - Compliance training; - Office posters.

Effective date: April 2023

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