



# Anti-Bribery & Anti-Corruption Policy Statement

## PURPOSE

The purpose of this policy Statement is to establish and communicate the commitment of AD Ports Group to conducting business with integrity, transparency, and accountability. This Statement aims to reflect on AD Ports Group Anti-Bribery and Anti-Corruption (ABAC) Policy established to affirm the Group's commitment in preventing, detecting, and addressing bribery and corruption in all forms within the organisation and its interactions with external parties.

## SCOPE

The ABAC policy applies to all employees, stakeholders, contractors, and any other third parties acting on behalf of AD Ports Group. It covers all business activities, including but not limited to, interactions with government officials, private sector partners, and any other stakeholders.

## POLICY STATEMENT

AD Ports Group is committed to maintaining the highest standards of ethical conduct and integrity in all its business dealings. The Group strictly prohibits any form of bribery or corruption, whether direct or indirect, and expects all associated individuals to adhere to the following principles:

- **Prohibition of Bribery and Corruption:** No employee or associated person shall offer, give, solicit, or accept any form of bribe or corrupt payment, including facilitation payments, kickbacks, or any other improper advantage.
- **Compliance with Laws:** All business activities must comply with applicable anti-bribery and anti-corruption laws and regulations. Employees are expected to adhere to these laws and regulations in all their professional conduct.
- **Gifts, Hospitality and Entertainment (GHE):** All gifts, hospitality, and entertainment, offered or received must be reasonable, transparent, and comply with the applicable laws and regulations. Disclosure and approval of all GHE is defined in line with applicable regulations and approved policy.
- **Due Diligence:** In addition to any other obligations, appropriate due diligence must be conducted on third parties, including agents, consultants, and contractors, to ensure they comply with anti-bribery and anti-corruption regulations and standards.
- **Reporting a Concern and Whistleblowing Channels:** Employees and associated persons are required to report, in a "Good Faith", any suspected or actual bribery or corruption incident. AD Ports Group provides safe, independent and confidential mechanisms for reporting concerns without fear of retaliation.
- **Training and Awareness:** Regular training and awareness programmes shall be conducted to ensure all employees and associated persons understand their responsibilities under the policy.
- **Monitoring and Review:** The effectiveness of the policy will be regularly monitored and reviewed, and any necessary updates will be made to ensure ongoing compliance with legal and ethical standards.

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