



Executive Summary

1. Compliance & Governance Actions

- **Legal Adherence:** Ensure all business activities strictly comply with the UAE Federal Law No. 31 of 2021, as amended through Federal Decree – Law No. 36 of 2022 concerning public and private sector bribery, and relevant Anti-Money Laundering (AML) / Counter-Terrorist Financing (CTF) regulations.
- **International Standards:** Voluntarily adopt universal best practices to enhance defences against corruption, particularly regarding facilitation payments and third-party due diligence, even where not explicitly mandated by local law.
- **Leadership Oversight:** Maintain active Board of Directors oversight and senior management commitment ("tone at the top") to drive ethical conduct and policy adherence.
- **Compliance Function:** Empower the designated Compliance Officer to administer the policy, conduct training, manage investigations, and oversee internal controls related to ABC.

2. Risk Management & Due Diligence Actions

- **Risk Assessment:** Conduct formal, systematic bribery and corruption risk assessments at least annually, and on an ad-hoc basis when significant business changes occur (e.g., new markets, major partnerships).
- **Resource Allocation:** Utilize a risk-based approach to tailor controls and allocate compliance resources effectively, focusing on higher-risk activities, regions, or relationships.
- **Third-Party Due Diligence:** Implement and consistently apply risk-based due diligence procedures before engaging any third party (agents, distributors, consultants, suppliers, JV partners, etc.). Document these checks thoroughly.
- **Contractual Clauses:** Integrate explicit anti-bribery clauses into all contracts with third parties, requiring compliance with the policy and relevant laws, and reserving the right to audit and terminate for violations.

3. Operational Controls & Procedures Actions

- **Internal Controls:** Implement and maintain robust internal controls, including clear segregation of duties (especially in procurement and payments) and defined authorization hierarchies, to prevent and detect illicit transactions.
- **Record Keeping:** Ensure accurate, transparent, and timely recording of all financial transactions. Maintain comprehensive records and audit trails for at least five years (or longer if required for investigations/legal matters). Prohibit false accounting or off-the-books accounts.
- **Gifts & Hospitality:** Strictly adhere to the policy's guidelines on offering/accepting gifts and hospitality, including value thresholds (e.g., requiring pre-approval above AED 1,000) and prohibitions during sensitive periods (e.g., tenders). Maintain and monitor a central Gift & Hospitality Register.
- **Facilitation Payments:** Strictly prohibit the offering or making of facilitation payments. Train staff to refuse such requests and report solicitation attempts immediately to the Compliance Department.
- **Conflicts of Interest:** Require prompt disclosure of all actual, potential, or perceived conflicts of interest by employees and affiliates. Implement clear procedures for evaluating disclosures and applying mitigation measures (e.g., recusal, divestment).

4. Training, Communication & Culture Actions

- **Mandatory Training:** Implement regular, role-specific ABC training programs for all employees and relevant contractors upon hiring and periodically thereafter. Maintain training records.
- **Policy Communication:** Ensure the policy is readily accessible to all employees and relevant third parties. Communicate any policy updates promptly and effectively.
- **Whistleblowing:** Promote awareness and use of confidential reporting channels for employees and third parties to raise concerns about suspected misconduct without fear of retaliation.



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- **Non-Retaliation:** Strictly enforce the non-retaliation policy to protect individuals who report concerns in good faith.
- **Culture of Integrity:** Foster an organizational culture where ethical conduct is expected, valued, and openly discussed, and where employees feel empowered to speak up.

5. Monitoring, Enforcement & Improvement Actions

- **Monitoring:** Implement continuous monitoring mechanisms (e.g., transaction analysis, audit reviews) to detect potential red flags or control weaknesses in real-time.
- **Investigations:** Investigate all reported allegations of bribery or corruption promptly, fairly, and confidentially, following established procedures. Maintain secure investigation records.
- **Disciplinary Action:** Apply consistent and proportionate disciplinary measures (up to and including termination) for policy violations, based on a clear framework.
- **Remedial Actions:** Use findings from audits and investigations to identify and rectify control weaknesses, update procedures, and provide targeted retraining where necessary.
- **Policy Review & Updates:** Conduct a formal review of the ABC policy at least annually to ensure its continued relevance and effectiveness. Update the policy in response to regulatory changes, risk assessments, or lessons learned. Track the effectiveness of policy implementation and updates.

