



## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

**SCOPE:** This policy is applicable to all the employee of Tigris Gold Refinery and its subsidiaries, including senior management staffs and to the members of the board of directors of the company. Tigris Gold Refinery is committed to conduct its business legally, honestly and with transparency and integrity. The policy further extends to all national and international business dealings and transactions of the company

**DEFINITION OF A BRIBE:** A bribe is an inducement payment, reward, or advantage offered to any person in order to gain any commercial or personal advantage. A bribe can be of anything of value notonly money, it can be gifts, inside information, sexual or other favors, corporate hospitality or entertainment.

### **POLICY STATEMENT:**

Tigris Gold Refinery FZE has a zero-tolerance approach to bribery and corruption. All Associated Persons are strictly prohibited from engaging in any form of bribery or corruption, whether directly or indirectly.

This prohibition includes, but is not limited to:

- a. Offering or giving bribes to government officials, private individuals, or entities.
- b. Requesting or accepting bribes.
- c. Making or accepting facilitation payments.
- d. Engaging in any activity that could lead to a perception of bribery or corruption.

**COMPLIANCE:** It is the responsibility of the partners, shareholders, and the senior management staffs of the company to abide by all laws, regulations and international conventions applicable in the countries where the company operates its business. Ultimate responsibility for compliance with this policy throughout the group is taken by the Head of compliance.

### **RESPONSIBILITIES:**

#### **1. Management:**

- a. Demonstrate strong leadership and commitment to anti-bribery compliance.
- b. Ensure adequate resources are allocated to implement and enforce this policy.
- c. Provide regular training and awareness programs.

#### **2. Employees:**

- a. Comply with this policy and all applicable laws.
- b. Report any suspected violations of this policy.
- c. Exercise due diligence when dealing with third parties.

#### **3. Compliance Officer:**

- a. Oversee the implementation and enforcement of this policy.
- b. Conduct risk assessments and due diligence.
- c. Investigate reported violations.
- d. Maintain accurate records.

**GIFTS AND HOSPITALITY:** This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in few circumstances gifts and hospitality may amount to bribery and all employees must abide to the Anti- Bribery policy of the company. Any kind of gifts that exceed the customary courtesies, or thatfail to observe standards of honesty and modesty shall be immediately reported to your immediate supervisor. No gifts shall be accepted by any employee or management of the company that might appear to be offered for influencing the company to act in any of their favors.

Hospitality means and includes meals, invitation to functions or parties in connection with matters related to the company's activity. Reasonable and essential hospitality which seeks to improve the customers, clients' business relationship is considered as an established andessential part of the business.

Any gifts or hospitality exceeding USD 50/- must be approved by the Compliance Officer.

**POLITICAL AND CHARTITABLE CONTRIBUTIONS:** We do not make any donation to any political parties either in cash or kind as this can be perceived as an attempt to gain an improper business advantage. Charitable support and donations are acceptable whether of in-kind services, knowledge, or direct financial contributions. We only make charitable donations that are only legal and ethical.



**RECORD KEEPING:** All the financial records are maintained appropriately to have controls in place which will evidence the reason for making any payments to any related or third parties.

**TRAININGS:** The company gives anti-bribery training to all the employees, senior management staffs, Directors. The compliance officer will give training in person to all its members. All Existing members receive regular, relevant training on how to adhere to this policy.

**Training will cover:**

- The requirements of this policy.
- Applicable anti-bribery laws.
- How to identify and report violations

**REPORTING BRIBERY:** The company encourage everyone to raise concerns about any issue or suspicion of malpractice at the earliest stage. If you are uncertain about an act if it constitutes bribery or corruption, you may clarify it with your immediate supervisor or manager. Reports can be made to the Compliance Officer or through a confidential reporting mechanism. If the employee feel that should be discussed with the Managing Director or General Manager of the company he shall always raise his concern to them directly. Tigris Gold Refinery FZE will not tolerate retaliation against anyone who reports a violation in good faith.

**REVIEW OF POLICY:** Tigris Gold Refinery Compliance Manager is responsible for the content and administration of the Policy. The compliance Manager will closely monitor compliance with this Policy, as well as its effectiveness. The Policy is reviewed every two years, or more frequently in line with changes in legislation. All staff are required to re-acquaint themselves with this Policy every year.

**CONSEQUENCES OF NON-COMPLIANCE:** Violations of this policy may result in disciplinary action, including termination of employment or business relationships.

**PROPOSED BY:**

Mr. Ranjith Raj Kallurumbil  
Head of Compliance  
Tigris Gold Refinery FZE

**APPROVED BY**

Mr. Ahmed Mohammed Hamodi Alabid  
Managing Director-CEO  
Tigris Gold Refinery FZE



**Date:** 10-01-2024

**Place:** Sharjah- United Arab Emirates