

ALHAMER TRADING EST. (RULA PHARMACY)

Anti-bribery and Corruption Policy

Department	ATE Quality Assurance Function	SOP #	QMS 02
		Revision #	1.1
		Implementation Date	January 2015
Page #:	5	Last reviewed/Update date	July 2020
SOP Owner	ALHAMER TRADING EST.	Final Approval for V1.1	05 March 2023

1. PURPOSE

This anti-bribery policy exists to set out the responsibilities of Alhamer Trading Est. employees and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

It helps recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. SCOPE

All Employees and relevant Third Parties of the Business are subject to this policy, which will be communicated to them at the outset of our business partnership and as appropriate continuing forward.

3. DEFINITION

Bribery: The act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

Facilitation Payments: A form of Bribery in which small payments are made with the purpose of expediting or facilitating the performance by a Public Official of a routine governmental action and not to obtain or retain business or any other undue advantage. Facilitation payments are typically demanded by low level and low income Public Officials in exchange for providing services to which one is legally entitled without such payments.

Gifts, Invitations & Hospitality: Invitations given or received to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.

Intermediary: Includes but is not limited to Agents, consultants, sales representatives and sales partners.

Kickback: A bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.

Public Official: Officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

4. GIFTS, HOSPITALITY, AND INVITATIONS

We are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- It is made with the intention of influencing a third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits
- It is given in our name and not in the name of the Company.
- It includes cash or a cash equivalent (such as gift certificates or vouchers).
- It is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process)
- It is given secretly and not openly.

We recognize that the practice of giving business gifts differs depending on the circumstance. The question to ask is if the gift or hospitality is reasonable, justifiable, and proportionate under all the circumstances. Always take into account the reason for the gift, and make sure the value is within reasonable limits.

5. FACILITATION PAYMENTS & KICKBACKS

Employees shall ensure that they do not engage in facilitation payments and kickbacks; and do not offer gifts and promotional items in explicit or implicit exchange for specific favors or benefits from the recipient. We appreciate that the practice of giving business gifts varies from one situation to another.

6. RESPONSIBILITIES

6.1 It is not acceptable for us (or someone on our behalf) to:

(a) Pay, promise to pay, or extend hospitality to a public official or third party in order to "facilitate" or expedite up a routine procedure.

(b) Offer, promise to give, or offer payment, gift, or hospitality in the hope that it will be accepted as payment for a business advantage already provided.

(c) No payments are made to a health care professional unless such payment is properly documented for and/or is justified under local laws.

(d) Nothing of value is offered or given to a health care professional, which may be viewed as an incentive to start, continue or use a product.

(e) accept payment from a Third Party that we know, or suspect is offered with the expectation that it will obtain a business advantage from them.

(f) Engage in any activity that might lead to a breach of this policy or perceived breach of this policy.

It is our responsibility to ensure sure that all accounts, invoices, and other records pertaining to interactions with Third Parties, such as clients, suppliers, and business contacts, are created and kept with strict correctness and completeness. There cannot be any "off-book" accounts.

Sponsorships of health care professionals are approved by the concerned health care organization and that only reasonable travel, meals and accommodation costs are paid for in accordance with company's polices.

If you are asked to make a payment on the Company's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the 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 company, wherever possible, prior to taking any action

Employees shall ensure that any forms of fraud or fraudulent acts are reported to the Company at the time of becoming aware of such acts. Fraud shall include any deliberate and deceptive act, done with the intention of obtaining an unauthorized benefit in the form of money and / or services.

Examples include:

- Embezzlement, misappropriation of funds and / or financial irregularities
- Forgery and / or alteration of any document
- Manipulation of accounting information and / or financial statements
- Thief of supplies, inventory, funds and / or any other asset owned by the Company.

Every Employee has a responsibility to read, understand, and adhere by this policy. Always avoid taking any activity that might lead to, or even just imply, a breach of this policy.

Any Employee who violates this policy will be subject to disciplinary action, which may include dismissal for serious misconduct.

7. PROTECTION

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Alhamer Trading Est. understands that you may feel worried about potential repercussions and will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Alhamer Trading Est. will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

8. MONITORING AND REVIEW


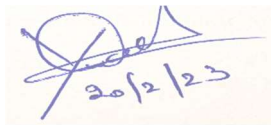
The Mangers and Head of Departments shall monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy, and effectiveness. Any deficiencies identified will be rectified as soon as possible.

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

All directors, managers, employees, third parties are responsible for the success of this Policy and should ensure they follow the procedures set out herein to disclose any suspected wrongdoing.

9. REVISION

- SOP heading with Document No.
- Modified as per the per the new format.
- Subheadings added Gifts, Hospitality, And Invitations, facilitation payments & kickbacks, Protection and monitoring and review.

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