

Anti-Bribery and Corruption Code of Conduct Policy

MONA

INTRODUCTION:

Our company is committed to maintaining the highest standards of ethics, honesty, and integrity in all our business dealings. We believe that bribery and corruption are detrimental to society and undermine the trust and confidence that our customers, suppliers, and other stakeholders have in us. This code of conduct sets out our commitment to preventing bribery and corruption in all our business activities.

1. General Principles:

1.1 Our employees must not engage in any form of bribery or corruption in connection with our business activities, whether directly or indirectly.

1.2 We will not tolerate any form of bribery or corruption, whether it involves the payment or receipt of money or other forms of inducement or reward.

1.3 We will comply with all applicable laws and regulations relating to anti-bribery and corruption, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

1.4 We will ensure that our employees are trained on this code of conduct and our policies and procedures relating to anti-bribery and corruption.

2. Gifts, Entertainment, and Hospitality:

2.1 Our employees must not offer, give, or receive any gift, entertainment, or hospitality that could be perceived as a bribe or could compromise their impartiality.

2.2 We recognize that gifts, entertainment, and hospitality are a normal part of business relationships and may be acceptable in certain circumstances. However, such gifts, entertainment, or hospitality must be reasonable, proportionate, and not intended to influence the recipient's behavior.

2.3 Our employees must obtain approval from their manager before offering or accepting any gift, entertainment, or hospitality, and must document the details of such approval.

ANTI-BRIBERY AND CORRUPTION CODE OF CONDUCT POLICY

MONA

3. Conflicts of Interest:

3.1 Our employees must avoid any conflicts of interest that could give rise to the perception or reality of bribery or corruption.

3.2 We will ensure that our employees are aware of our policies and procedures relating to conflicts of interest and are trained to identify and manage potential conflicts of interest.

4. Due Diligence:

4.1 We will conduct appropriate due diligence on our business partners, including suppliers, agents, and other intermediaries, to ensure that they share our commitment to preventing bribery and corruption.

4.2 We will only work with business partners who have demonstrated their commitment to ethical business practices and compliance with anti-bribery and corruption laws and regulations.

5. Reporting and Investigation:

5.1 Our employees must report any suspected or actual bribery or corruption to their manager, the company's legal department, or another designated point of contact.

5.2 We will investigate all reported incidents of bribery or corruption promptly, thoroughly, and impartially.

5.3 We will take appropriate action against any employee who violates this code of conduct, up to and including termination of employment.

CONCLUSION:

Our company is committed to maintaining the highest standards of ethics, honesty, and integrity in all our business dealings. We believe that preventing bribery and corruption is essential to maintaining the trust and confidence of our customers, suppliers, and other stakeholders. This code of conduct sets out our commitment to preventing bribery and corruption in all our business activities and provides a framework for our employees to act with integrity and professionalism