



### **Anti-Bribery Policy**

We at **Promise Gold Refinery FZC** have established and laid out an anti-bribery policy that provides all necessary information about how to recognize bribery and other corruption-related issues. It also enables the employees of the company to work with utmost integrity, professionally and fairly.

#### **The extent of this policy**

A bribe is a type of misconduct in which there is an inducement payment, reward, or advantage offered to any person to gain any commercial or personal advantage. The definition of a bribe is not definitive. It can be of anything of value, not only money; it can be gifts, inside information, sexual or other favors, corporate hospitality, or Entertainment.

This policy of **Promise Gold Refinery Co** applies to all the employees of Tigris Gold including senior management staff and the members of the board of directors of the company, to ensure that no part of the company resorts to bribery. Tigris Gold Refinery is committed to conducting its business legally, honestly, and with transparency and utmost integrity. The policy further extends to all national and international business dealings and transactions of the company.

The definition and what can conclude as a bribe is listed and defined below:

#### **GIFTS AND HOSPITALITY**

It is worthy to note that this policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, it draws boundaries as to what can be considered a gift and what can not; in few circumstances, gifts and hospitality may amount to bribery. All employees must be aware of what constitutes a bribe and shall abide by the company's Anti-Bribery policy. Any kind of gifts that exceed the customary courtesies or that fail to observe standards of honesty and modesty shall be immediately reported to your immediate supervisor as it is a form of bribe. No gifts shall be accepted by any employee or management of the company that might appear to be offered for influencing the company in exchange for any favors. Hospitality means and includes meals, invitations to functions, or parties in connection with matters related to the company's activity. Reasonable and essential hospitality, which seeks to improve the customers' and clients' business relationship, is considered an established and essential part of the business.

#### **COMPLIANCE**

It is the ultimate responsibility of all the partners, shareholders, and senior management staff 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, who checks on such cases.



## RECORD KEEPING

To ensure all transactions are legitimate and honest, it is important to maintain all the financial records appropriately to have controls in place, evidence of the reason for making any payments to any related or third parties.

## TRAINING

To ensure that all employees are aware of this policy and how it works, **Promise Gold Refinery FZC** gives anti-bribery training to all the employees, senior management staff, and Directors. The compliance officer will give training in-person to all its members. All Existing members also receive regular, relevant training on how to adhere to this policy.

## REPORTING BRIBERY

The company encourages everyone to raise concerns about any issue or suspicion of malpractice at the earliest stage, and it provides them with a platform for doing so. If you are uncertain about an act that constitutes bribery or corruption, you may clarify it with your immediate supervisor or manager. If any employee feels that it should be discussed with the Managing Director or General Manager of the company, he shall always raise his concern to them directly.

## REVIEW OF POLICY

Even when the policy is established, we ensure that it is carried out properly. We hold yearly training along with training for new employees and training for when the policy is modified. **Promise Gold Refinery FZC** Compliance Manager is responsible for the content, administration, and implementation of the Policy. The compliance manager will closely monitor compliance with this Policy throughout his/her tenor and test its effectiveness. The Policy is reviewed every two years, or more frequently in line with changes in legislation, and the training is also held regularly for the same. All staff is required to reacquaint themselves with this Policy every year.

## Conclusion

It is very important to **Promise Gold Refinery FZC** that all our business is carried out in a legitimate way by following a code of ethics and laws. We have established an anti-bribery policy that ensures the same. It also provides a platform for the employees of the company to raise questions regarding what constitutes a bribe and what does not. To ensure the proper implementation of this policy, we also carry out regular and thorough training. This policy applies to every single person working at Tigris Gold Refinery. This article outlines all the areas of the anti-bribery policy, who it applies to, how it is carried out and what bribery constitutes.

