



# GI Corporation

## Anti-Bribery and Corruption Policy

### 1. Purpose and Commitment

GI Corporation is committed to conducting its business ethically, with integrity, and in full compliance with all applicable laws and regulations. We have a **zero-tolerance** approach to bribery and corruption. The purpose of this policy is to establish clear rules to prevent corruption and ensure that all GI Corporation personnel understand their responsibilities in upholding our ethical standards.

### 2. Scope

This policy applies to all individuals working at all levels and grades within GI Corporation, including:

- Board members, officers, and directors.
- All employees (whether full-time, part-time, or temporary).
- Consultants, contractors, trainees, and volunteers.
- Third parties, including agents, brokers, partners, suppliers, and sponsors acting on behalf of GI Corporation (collectively referred to as "Associated Persons").

### 3. Definitions

- **Bribery:** Offering, promising, giving, accepting, or soliciting any financial or other advantage as an inducement or reward for an action that is illegal, unethical, or a breach of trust.
- **Corruption:** The abuse of entrusted power for private gain.
- **Public Official:** Any officer or employee of a government, a government-owned or controlled enterprise (e.g., a state-owned utility), a public international organization, or any person acting in an official capacity for them. Also includes political parties, party officials, and candidates for political office.
- **Facilitation Payments:** Small, unofficial payments made to secure or expedite a routine government action by a government official (often referred to as "grease payments").

### 4. Core Policy Rules

#### 4.1 Prohibition of Bribery

GI Corporation strictly prohibits the offering, giving, solicitation, or acceptance of any bribe, whether in the public or private sector. You must never offer or accept anything of value to improperly influence a business decision or gain an unfair business advantage.

#### 4.2 Facilitation Payments and Kickbacks

GI Corporation strictly prohibits making facilitation payments or "kickbacks" of any kind. If you are asked to make a payment on behalf of GI Corporation, you must always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.

*Exception:* If a payment is demanded under an imminent threat to your health, safety, or liberty, you may make the payment. Such incidents must be reported to the Compliance Officer immediately.

### 4.3 Gifts, Entertainment, and Hospitality

Gifts and hospitality can be used to build goodwill, but they must never be used to unduly influence decision-making. All gifts and entertainment given or received must be:

- **Reasonable and proportionate:** Never lavish or extravagant.
- **Transparent:** Given openly, not secretly.
- **Properly recorded:** Logged in the company's expense and gift registers.
- **Compliant:** Allowed under local laws and the recipient's own organizational policies.
- *Cash or cash equivalents (like gift cards) are strictly prohibited.*

### 4.4 Political and Charitable Contributions

- **Political:** GI Corporation does not make contributions to political parties, public officials, or candidates in its corporate capacity.
- **Charitable:** Charitable donations must be ethical, legal, and not used as a subterfuge for bribery. All charitable contributions made on behalf of GI Corporation must be approved in advance by the Executive Board or designated Compliance Officer.

## 5. Third-Party Due Diligence

GI Corporation can be held liable for the corrupt actions of third parties acting on our behalf. Therefore, before engaging any third party (such as an agent, distributor, or consultant), employees must:

- Conduct appropriate, risk-based due diligence to ensure the third party is reputable.
- Ensure that written contracts include standard anti-bribery and corruption clauses.
- Monitor third-party performance and payments regularly.

## 6. Record-Keeping and Accounting

Accurate record-keeping is vital to preventing corruption. GI Corporation must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.



- All expense claims relating to hospitality, gifts, or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- "Off-the-books" accounts, slush funds, or fraudulent recording of transactions are strictly prohibited.

## 7. Reporting and Whistleblowing

All employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

- If you suspect a violation of this policy has occurred or may occur, you must report it to your manager, the Legal Department, or the Chief Compliance Officer.
- **Non-Retaliation:** GI Corporation ensures that no one suffers any detrimental treatment (including dismissal, disciplinary action, or threats) as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offense has taken place.

## 8. Disciplinary Action

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. GI Corporation reserves the right to terminate our contractual relationship with other workers or third parties if they breach this policy.