

## Inmaa Al Bilad Contracting Co. Anti-Bribery & Corruption Policy

### 1. Introduction

Inmaa Al Bilad Contracting Co. is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including anti-bribery and anti-corruption laws. This Anti-Bribery & Corruption Policy outlines our commitment to preventing bribery and corruption in all its forms and provides guidance on how employees should act to uphold this commitment.

### 2. Scope

This policy applies to all employees, directors, officers, contractors, consultants, and any other party representing Inmaa Al Bilad Contracting Co., regardless of their location. It covers all business dealings and transactions in all the countries in which we operate.

### 3. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in a position of authority.
- **Corruption:** The abuse of entrusted power for private gain.
- **Facilitation Payments:** Small, unofficial payments made to secure or expedite a routine or necessary action by a government official or other third party.

### 4. Policy Statements

#### 4.1 Prohibition of Bribery and Corruption

- Inmaa Al Bilad prohibits all forms of bribery and corruption. This includes offering, promising, giving, accepting, or requesting bribes or any other improper payments or advantages.

#### 4.2 Gifts and Hospitality

- Employees must not offer or accept gifts, hospitality, or entertainment that could influence, or appear to influence, business decisions. Any gifts or hospitality offered or received must be reasonable, proportionate, and transparently recorded.

#### 4.3 Facilitation Payments

- Facilitation payments are strictly prohibited. Employees must not make facilitation payments of any kind.



#### 4.4 Third Parties

- We are committed to ensuring that our business partners, including agents, consultants, and contractors, uphold similar anti-bribery and corruption standards. Appropriate due diligence must be conducted before engaging with third parties, and their compliance with this policy must be monitored.

#### 4.5 Charitable Donations and Sponsorships

- All charitable donations and sponsorships must be made in accordance with Inmaa Al Bilad's procedures and must not be used as a subterfuge for bribery.

### 5. Responsibilities

#### 5.1 Employees

- All employees are responsible for understanding and complying with this policy. They must avoid any activity that might lead to, or suggest, a breach of this policy.

#### 5.2 Management

- Managers at all levels are responsible for ensuring that their teams understand and comply with this policy. They must foster a culture of integrity and transparency.

### 6. Reporting and Compliance

#### 6.1 Reporting Violations

- Employees are encouraged and required to report any suspected bribery, corruption, or violations of this policy. Reports can be made confidentially to the Compliance Officer or through the company's whistleblowing mechanism.

#### 6.2 Investigation

- All reports of suspected bribery or corruption will be taken seriously and investigated promptly and thoroughly. No employee will suffer retaliation for reporting in good faith.

#### 6.3 Disciplinary Action

- Any employee found to have violated this policy will face disciplinary action, which may include termination of employment and legal action.

### 7. Training and Communication

- Regular training on anti-bribery and anti-corruption will be provided to all employees to ensure they understand and can comply with this policy.
- This policy will be communicated to all business partners, and relevant third parties and will be available on the company's website and intranet.



## 8. Monitoring and Review

- The Compliance Officer is responsible for monitoring the implementation of this policy and its effectiveness.
- This policy will be reviewed annually and updated as necessary to ensure it remains relevant and effective in combating bribery and corruption.

## 9. Conclusion

Inmaa Al Bilad Contracting Co. is dedicated to maintaining the highest standards of integrity and accountability. Compliance with this Anti-Bribery & Corruption Policy is essential to protect our reputation and ensure our long-term success.

## Approval and Adoption

This policy has been approved by the CEO and the Board of Directors of Inmaa Al Bilad Contracting Co. and is effective as of 01/01/2022.

Yours sincerely,

**CEO: Mohammed Al Senan**

**Date: 01/01/2022**

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