

# FITC ENERGY GROUP

*Est. 2024*

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## Anti-Bribery & Corruption Policy

*Zero Tolerance for Bribery and Corrupt Practices*

Version: 1.0

Effective Date: 1 January 2025

Approved by: Board of Directors

**Classification: Confidential — Internal Use Only**

## 1. Policy Statement

FITC Energy Group operates a strict zero-tolerance policy with respect to bribery and corruption in all its forms. We are committed to acting professionally, fairly, and with integrity in all our business dealings, and to implementing and enforcing effective systems to counter bribery and corruption.

This Policy applies globally. It encompasses compliance with the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), Kenya's Anti-Corruption and Economic Crimes Act, and all other applicable anti-corruption legislation in jurisdictions where FITC Energy Group conducts business.

## 2. Definitions

Field	Details
Bribery	Offering, promising, giving, accepting, or soliciting a financial or other advantage to induce or reward improper performance of a function or activity.
Corruption	Dishonest or fraudulent conduct by those in power, typically involving bribery; the abuse of entrusted power for private gain.
Public / Government Official	Any person employed by, or acting in an official capacity for, a government, state-owned enterprise, international organisation, or political party.
Facilitation Payment	An unofficial payment made to a government official to secure or expedite a routine service. These are prohibited under this Policy.
Third Party	Any individual or organisation engaged by or acting on behalf of FITC Energy Group, including agents, distributors, joint venture partners, and suppliers.

## 3. Prohibited Conduct

No FITC Energy Group personnel or associated persons may, directly or through a third party:

- Offer, pay, promise, or authorise a bribe to any person, whether a public official or private individual
- Request, accept, or agree to receive a bribe
- Make facilitation payments of any size to any official
- Use a third party as a conduit for bribery
- Engage in corrupt practices in bidding, procurement, or contracting processes

This prohibition applies regardless of whether the act is committed in Dubai, elsewhere in UAE, or any other country of operation.

## 4. Gifts & Hospitality (ABC Perspective)

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In the context of anti-bribery compliance:

- All gifts and hospitality provided to or received from government officials must be pre-approved by the Compliance Officer
- Gifts and hospitality must never be offered during tender evaluation or procurement periods
- All gifts and hospitality exceeding USD 50 must be recorded in the Gifts Register
- Lavish or disproportionate hospitality is prohibited at all times

## 5. Political Contributions

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FITC Energy Group and its subsidiaries does not make political contributions — whether in cash, in kind, or through services — to any political party, political candidate, or political campaign, in any jurisdiction. This applies to direct contributions and indirect contributions made through affiliates, intermediaries, or trade associations.

## 6. Charitable Donations & Sponsorships

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Charitable donations and sponsorships may be used as a conduit for bribery. All donations and sponsorships must therefore:

- Be approved by the Compliance Officer and recorded in the Donations Register
- Not be made to organisations connected to government officials with whom FITC Energy Group has, or seeks, a business relationship
- Be supported by documentation confirming the legitimate charitable purpose

## 7. Due Diligence on Third Parties

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Before engaging any third party, FITC Energy Group will conduct risk-based anti-bribery due diligence, proportionate to the risk profile of the engagement. This includes:

- Screening against sanctions lists and adverse media
- Verifying ownership structure and beneficial ownership
- Assessing the business rationale and proportionality of fees and commissions
- Obtaining contractual anti-bribery representations and warranties

Enhanced due diligence is required for third parties operating in high-risk jurisdictions, in sectors with elevated corruption risk, or in dealings involving government officials.

## 8. Record-Keeping & Financial Controls

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FITC Energy Group maintains accurate and transparent financial records in compliance with applicable accounting standards. Specifically:

- No off-book accounts or secret funds may be maintained
- All transactions must be accurately recorded and supported by proper documentation

- Payments must never be made to third parties in cash above the approved threshold
- Finance personnel must flag unusual or suspicious payment requests to the Compliance Officer

## 9. Reporting Suspicions

Any employee who suspects bribery or corruption has occurred, is occurring, or is about to occur must report this immediately to the Compliance Officer or via the Ethics Hotline. Reports may be made anonymously. FITC Energy Group will investigate all reports promptly, fairly, and confidentially.

## 10. Consequences

Breach of this Policy constitutes gross misconduct and will result in immediate investigation. Consequences may include summary dismissal, civil claims for recovery of losses, and referral to the relevant prosecuting authorities. FITC Energy Group will not pay fines or penalties incurred by employees as a result of their own bribery or corruption.

## Policy Owner & Review

Field	Details
Policy Owner	Chief Compliance Officer
Review Frequency	Annual (or following significant regulatory change)
Next Review Date	1 January 2026
Applicable Laws	UAE Anti-Corruption & Economic Crimes Act; UK Bribery Act 2010; US FCPA; AU Criminal Code Act
Governing Body	FITC Energy Group Board of Directors