



ANTI BRIBERY AND CORRUPTION POLICY

1. Purpose

The purpose of this Anti-Bribery and Corruption Policy is to ensure that MALYK LTD conducts its business in an ethical and lawful manner, in compliance with the Bribery Act 2010 and other relevant UK legislation. This policy outlines the principles and procedures to prevent bribery and corruption.

2. Scope

This policy applies to all employees, contractors, agents, and third parties acting on behalf of MALYK LTD.

3. Policy Statement

MALYK LTD has a zero-tolerance approach to bribery and corruption. We are committed to conducting all of our business activities with integrity, transparency, and fairness. We will not tolerate any form of bribery or corruption and will take all necessary steps to prevent it.

4. Definitions

- **Bribery:** Offering, promising, giving, accepting, or soliciting something of value as a means to influence the actions of an individual in a position of power.
- **Corruption:** Abuse of entrusted power for private gain.

5. Prohibited Conduct

MALYK LTD prohibits the following conduct:

1. **Bribery of Public Officials:**
 - Offering, promising, or giving a financial or other advantage to a public official with the intention of influencing them in their official capacity.
2. **Bribery in Commercial Transactions:**
 - Offering, promising, or giving a financial or other advantage to any person to induce them to perform their functions or activities improperly.
3. **Receiving Bribes:**
 - Accepting or agreeing to accept a financial or other advantage in exchange for performing functions or activities improperly.
4. **Facilitation Payments:**
 - Making small payments to expedite or secure the performance of a routine governmental action.
5. **Kickbacks:**
 - Returning a portion of the payment received in a business transaction as a reward for making or fostering business arrangements.

6. Responsibilities

- **Management:**
 - Promote a culture of integrity and compliance.
 - Ensure the implementation and effectiveness of this policy.
 - Provide training and resources to prevent bribery and corruption.
- **Employees:**
 - Comply with this policy and all relevant laws.
 - Report any suspected or actual bribery or corruption.
- **Human Resources:**
 - Provide support and guidance on anti-bribery and corruption issues.
 - Ensure that recruitment and other employment practices are free from bribery and corruption.

7. Reporting and Whistleblowing

Employees are encouraged to report any concerns or suspicions of bribery or corruption. Reports can be made confidentially and without fear of retaliation to:

- **Line Manager:** Directly report to your immediate supervisor.
- **Compliance Officer:** Report to the designated compliance officer.
- **Whistleblowing Hotline:** A confidential hotline for reporting bribery and corruption (contact details to be provided internally).

All reports will be taken seriously and investigated promptly and thoroughly.

8. Gifts and Hospitality

- **Acceptable Gifts and Hospitality:**
 - Must be reasonable, proportionate, and not intended to influence business decisions.
 - Must be declared and recorded in the Gifts and Hospitality Register.
- **Unacceptable Gifts and Hospitality:**
 - Any gifts or hospitality that could be perceived as a bribe or influence business decisions.

9. Due Diligence

MALYK LTD will conduct due diligence on all third parties, including suppliers, agents, and business partners, to ensure they comply with our anti-bribery and corruption standards.

10. Training and Awareness

All employees will receive training on anti-bribery and corruption to ensure they understand their responsibilities and the importance of compliance.

11. Monitoring and Review

MALYK LTD will regularly monitor and review the effectiveness of this policy and our anti-bribery and corruption measures. This policy will be reviewed annually and updated as necessary to ensure continued compliance with legislation and best practices.

Imran, Founder
MALYK LTD

Date: 1st July 2024