

Anti-bribery policy

Definition:

A bribe is considered to be an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

Summary:

ServiceJi is dedicated to preventing bribery and maintaining a culture within the organization where bribery is never acceptable. ServiceJi does not endorse, offer, or accept bribes, whether internally within the organization or externally with other organizations.

ServiceJi conducts all its business dealings honestly and ethically, maintaining integrity and implementing effective systems to counteract bribery. We adhere to all laws relevant to combating bribery and corruption in every jurisdiction in which we operate. We are also bound by the laws of the United Kingdom, including the Bribery Act 2010, in respect of our conduct both domestically and internationally.

The purpose of this policy is to outline our responsibilities and those of our employees in observing and upholding our stance on bribery and corruption. This policy also provides guidance to those working for us on how to recognize and address issues of bribery and corruption. This document is part of employee induction and is also provided as a reference to clients and suppliers.

Who this policy covers:

This policy applies directly to all individuals working at all levels within ServiceJi as employees or agents, including any subsidiaries and their employees and agents, regardless of location. The policy is also provided to other associates of ServiceJi, such as our suppliers, who are required to comply with those provisions of the policy that apply to them, through the inclusion of relevant provisions in all contractual arrangements with ServiceJi. In this policy, "third party" refers to any individual or organization that comes into contact with ServiceJi.

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Prohibited actions:

The following list outlines prohibited actions and is not comprehensive:

- To give, promise to give, or offer a payment, gift, or hospitality with the expectation or hope of receiving a business advantage, or as a reward for a business advantage previously received;
- To give, promise to give, or offer a payment, gift, or hospitality to a government official, agent, or representative to "facilitate" or speed up a routine process;
- To accept payment from a third party when it is known or suspected to be given with the expectation of gaining a business advantage;
- To make or accept any facilitation payments from any organization or government official;
- To accept a gift or hospitality from a third party if there is knowledge or suspicion that it is provided with the expectation of a business advantage in return;
- To threaten, intimidate, or retaliate against another worker who has refused to commit a bribery offense or who has raised concerns under this policy;
- To engage in any activity that could lead to a violation of this policy.

Exclusions:

This policy does not restrict the provision or receipt of normal and appropriate hospitality with third parties.

The giving or receiving of gifts is permissible if it adheres to the following criteria:

- It is not intended to influence a third party to secure or maintain business or a business advantage, or as a reward for securing or maintaining business or a business advantage, nor is it in explicit or implicit exchange for favours or benefits.
- It complies with local laws.
- It is given in the name of the organization.
- It does not include cash or cash equivalents (such as gift certificates or vouchers).
- It is suitable for the circumstances, for example, it is a ceremonial gift given during a festival or another special occasion (e.g., Christmas, Diwali, Eid).
- Considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- It is given transparently, not secretly.
- Gifts should not be offered to, or accepted from, government officials or representatives, politicians, or political parties without prior approval.

The practice of giving business gifts varies across different countries and regions; what may be customary and acceptable in one area might not be in another. The standard to apply is whether the gift or hospitality is reasonable, justifiable, and openly given under all circumstances.

Individual responsibilities:

Every individual is obligated to ensure that all payments align with this policy and that receipts are always obtained. ServiceJi does not contribute to political parties. Charitable contributions, permissible under local laws and ethical standards, require prior approval from a director before being made or offered.

It is mandatory for all individuals to have read, understood, and adhered to this policy. The prevention, detection, and reporting of bribery and other forms of corruption are the collective responsibility of everyone working for or under the control of ServiceJi. Individuals must avoid any actions that might lead to or suggest a violation of this policy. Any potential conflicts with this policy should be reported to a line manager immediately.

Violations of this policy may lead to disciplinary measures, including possible dismissal for gross misconduct. Individuals must maintain accurate financial records of all payments made and received, including the business reasons for such payments. All hospitality or gifts, whether accepted or offered, must be declared to Imad Khanzada on the central corporate gifts register, which is reviewed by management.

All documentation relating to dealings with third parties, such as clients, suppliers, and business contacts, must be prepared and maintained with utmost accuracy and completeness. These records should be stored on the corporate network and must not be deleted under any circumstances.

Individuals are encouraged to voice concerns about any suspected malpractices as early as possible. Concerns should be raised with a line manager and Imad Khanzada. Those who report suspicions will be protected from any form of retaliation, including disciplinary or unfavourable actions, regardless of whether the suspicions are confirmed.

Policy responsibility and monitoring:

Direct responsibility for overseeing, monitoring, and reporting on this policy rests with the Serviceji Operations Manager (operations@serviceji.co). All inquiries, comments, and suggestions regarding this policy should be directed to Imad Khanzada. Each individual is accountable for adhering to this policy and contributing to its success.

This policy is not incorporated into any employee's contract of employment and may be amended at any time.

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