

## ANTI BRIBERY AND CORRUPTION POLICY

URUVAN TRANSPORT SA commits to conduct its business with integrity, complying with the laws that apply to certain international commercial activities such as the US Foreign Corrupt Practices Act (FCPA) and the 2010 UK Bribery Act.

## In this policy:

"Bribery" consists in offering, promoting, giving, accepting or soliciting an advantage as an incentive for the action. It's illegal and an abuse of trust. Bribery is an incentive or reward offered, promised o given with the purpose of obtaining a business, contractual, regulatory or personal benefit.

## Our commitment is:

- 1. Never engage in any form of bribery, either directly or through any third party.
- 2. Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- 3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- 4. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- 5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
- 6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- 7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
- 8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- 9. Never induce or assist another individual to break any applicable law or regulation.

This policy applies to all our employees and we expect our business partners to comply with it.















