

	ACME ELECTRIC SWITCHGEAR L.L.C	ACME-HRM-ABC-2025
	ANTI BRIBERY & CORRUPTION POLICY	

1. PURPOSE:

The purpose of this policy is to ensure that ACME Electric Switchgear L.L.C conducts all business in an honest, transparent, and ethical manner. This policy sets out clear rules and expectations to prevent bribery, corruption, and improper influence in all business dealings.

2. SCOPE:

This policy applies to all employees, including management, supervisors, contractors, temporary staff, and any third parties acting on behalf of the company. It covers all company operations, including procurement, sales, production, accounts, inventory management, delivery section and project execution.

3. DEFINITIONS:

- **Bribery** is offering, giving, receiving, or soliciting anything of value to influence the actions of another person in a position of trust.
- **Corruption** is the abuse of entrusted power for personal or commercial gain.

4. POLICY STATEMENT:

ACME Electric Switchgear L.L.C has **zero tolerance** for bribery and corruption. All employees and business partners are expected to conduct themselves with integrity and in compliance with:

- UAE Federal laws and anti-corruption regulations.
- The company's internal Code of Conduct and Ethics.

5. ACCEPTABLE & UNACCEPTABLE PRACTICES:

5.1	Acceptable	Low-value, reasonable, and transparent business gifts or hospitality , such as promotional items or customary meals, only if: ▪ They are of modest value, ▪ They are not intended to influence a decision, and ▪ They are properly recorded and approved by management.
5.2	Unacceptable	▪ Offering, requesting or accepting cash, gifts or benefits in return for favourable treatment. ▪ Making facilitation and unofficial payments to public officials. ▪ Offering kickbacks to win contracts or to get approvals. ▪ Providing extravagant hospitality to influence decisions.

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6. RESPONSIBILITIES:

6.1	Management	▪ Promote a culture of integrity and ethical conduct. ▪ Implement effective internal controls and approval procedures. ▪ Provide training and guidance to employees on anti-bribery compliance.
6.2	Employees	▪ Must not offer, promise, or accept any form of bribe or improper advantage. ▪ Must immediately report any suspected bribery or unethical behaviour. ▪ Must keep accurate and complete records of all business transactions.
6.3	Third Parties & Suppliers	▪ Must comply with this policy as a condition of doing business with ACME Electric Switchgear L.L.C. ▪ Are expected to act ethically and transparently in all dealings with the company.

7. RECORD-KEEPING:

- All Payments, expenses, and transactions must be fully documented and supported by proper records.
- No undisclosed or “off-the-books” accounts are permitted.
- Finance and Accounts departments must review all expenditures for compliance with this policy.

8. REPORTING & WISTLEBLOWING:

- Any employee who suspects bribery or corruption must immediately report it to their Line Manager, the Accounts Manager, or directly to the General Manager.
- Reports may be made confidentially and will be investigated fairly and promptly.
- Retaliation against individuals who report in good faith will not be tolerated.
- Anonymous reporting channels (email or suggestion box) may also be used.

9. BREACH OF POLICY:

Any employee or third party found to have engaged in bribery or corruption will face:

- **Disciplinary action**, up to and including termination of employment.
- **Legal consequences** under UAE law, including fines or imprisonment.
- **Termination of business relationships** with involved external parties.

10. REVIEW AND MONITORING:

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This policy will be reviewed annually by management to ensure it stays effective and is in compliance with UAE regulations.

11. TRAINING AND AWARENESS:

- All employees will receive training on anti-bribery and ethical business practices.
- This policy will be included in the employee induction program.

12. ACKNOWLEDGEMENT:

All employees must read, understand, and adhere to this Code of Conduct. By continuing employment with ACME Electric Switchgear L.L.C, each employee agrees to comply fully with its principles and requirements.

Prepared By:




ANAS MAHMOOD – TECHNICAL ENGINEER (AUTHORIZED SIGNATORY)

DATE: 21/10/2025