POLICY AND PROCEDURE	ANTI BRIBERY POLICY	
VERSION 1	KWIKTIP LIMITED	2024

Anti-Bribery and Corruption Policy

KwikTip Limited is committed to conducting business with the highest ethical standards and adhering to all applicable anti-bribery and corruption laws and regulations. This policy outlines our zero-tolerance stance on bribery and corruption in any form, within our own operations and throughout our supply chain.

Scope:
This policy applies to all employees, directors, officers, agents, representatives, contractors, suppliers, and other business partners of KwikTip Limited.

Policy Statement:

- **Zero Tolerance:** KwikTip Limited prohibits the offering, promising, giving, or soliciting of any bribe, directly or indirectly, to any individual or organization, regardless of location or circumstances.
- **Gifts and Hospitality:** We have clear guidelines on offering or accepting gifts, hospitality, or any other form of inducement. These guidelines ensure such acts are reasonable, transparent, documented, and avoid any potential conflicts of interest. We maintain a record of all gifts and hospitality offered or received.
- **Facilitation Payments:** We are strictly against any form of facilitation payments, even if considered customary or expected in certain regions.
- **Political Contributions:** We have clear procedures for political contributions, ensuring compliance with all legal and ethical requirements.
- **Third-Party Relationships:** We hold our third-party partners to the same ethical standards as ourselves. We conduct thorough due diligence and include anti-bribery clauses in all contracts with these partners, clearly outlining our expectations and consequences for non-compliance.
- **Transparency and Reporting:** We encourage open communication and reporting of any suspected bribery or corruption activities through our confidential reporting channels. We will protect employees who report violations in good faith.

Implementation:

KwikTip Limited will implement this policy through the following actions:

- **Training and Awareness:** We provide regular training to our employees and relevant stakeholders on anti-bribery laws, regulations, and best practices. Training materials may include real-world examples to illustrate acceptable and unacceptable behaviours.
- **Due Diligence on Third Parties:** We conduct thorough due diligence on all potential and existing third-party partners to assess their anti-bribery compliance and mitigate any identified risks.
- **Contractual Clauses:** We include anti-bribery clauses in all agreements with third-party partners, clearly outlining our expectations and consequences for non-compliance.
- **Internal Controls and Monitoring:** We have established robust internal controls and monitoring systems to detect and prevent potential bribery activities.
- **Investigation and Sanctions:** We will investigate all reported or suspected bribery incidents promptly and thoroughly. We will apply disciplinary actions, including termination, for violation of this policy.

Record Keeping: We maintain accurate records of all gifts, hospitality, and other relevant transactions, including the nature of the gift/hospitality, value, purpose, and recipient.

Reporting:
All employees and stakeholders are responsible for complying with this policy and reporting any suspected violations to the designated Compliance Officer or through anonymous reporting channels. We will protect employees who report violations in good faith and will not tolerate any retaliation against such individuals.

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