



AL RAWAIS GOLD FZC

ANTI-BRIBERY & ANTI-CORRUPTION POLICY  
PROCEDURES, AND CONTROLS

Version 1.0 / November  
2022

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**1. DOCUMENT INFORMATION**

Document Title	<b>Anti-Bribery &amp; Anti-Corruption (ABC) Policy Procedures, And Controls.</b>
Department	<b>Compliance</b>
Document Version	<b>1.0</b>
Effective From	<b>January 2023</b>
Distribution	<ul style="list-style-type: none"> <li>• <b>Manager, Senior Management, Compliance Associates, All Employees of the Company; and</b></li> <li>• <b>Correspondent banks / Business Partners (if applicable).</b></li> </ul>

**2. DOCUMENT APPROVAL STATUS**

The AML / CFT /TFS Policy Prepared by	Name: Muhammad Akhtar Designation: Compliance Officer	Sign: 
The AML / CFT / TFS Policy Reviewed and Approved by		
Name: Muhammad Hanif Designation: Manager	Sign: 	

### 3. INTRODUCTION

At AL RAWAIS GOLD FZC, as dealers in precious metal stones, we are committed to conducting our business with the highest level of integrity and ethical standards. This Anti-Bribery & Anti-Corruption Policy outlines our commitment to preventing bribery and corruption in all aspects of our operations and interactions.

### 4. POLICY STATEMENT

We strictly prohibit any form of bribery, corruption, or unethical behavior in our business activities. We expect all employees, customers, suppliers, contractors, agents, and anyone associated with our company to adhere to this policy and uphold the values of transparency, honesty, and fairness.

### 5. DEFINITIONS

- Bribery: Offering, giving, receiving, or soliciting anything of value to influence the actions of an individual in a position of authority.
- Corruption: The abuse of power, often involving bribery, to gain an undue advantage.
- Precious Metal Stones: Gold, Gold Bars, Scrab Gold.

### 6. COMPLIANCE WITH APPLICABLE LAWS

We commit to complying with all anti-bribery and anti-corruption laws and regulations in the jurisdictions where we operate. This includes, but is not limited to, the United Arab Emirates laws.

### 7. PROHIBITED CONDUCT

The following actions are strictly prohibited:

- a) Offering, giving, receiving, or soliciting bribes or kickbacks to/from anyone, including government officials, clients, suppliers, or partners.



- b) Influencing business decisions through personal relationships or providing improper benefits.
- c) Concealing or facilitating bribes, whether directly or through intermediaries.
- d) Engaging in any activity that may lead to conflicts of interest or compromise our integrity.

## **8. GIFTS, ENTERTAINMENT, AND HOSPITALITY**

Gifts, entertainment, and hospitality may be offered or accepted only if they are:

- a) Aligned with customary business practices and of a reasonable value.
- b) Not intended to influence decision-making or create a sense of obligation.
- c) Transparently recorded in our records.

## **9. DUE DILIGENCE**

In accordance with our commitment to upholding the highest standards of ethics and compliance, we have established a robust due diligence process for evaluating potential business relationships with third parties. This process is designed to ensure the integrity of our partners and their adherence to anti-bribery laws and regulations.

### **9.1. INITIAL ASSESSMENT**

When considering entering into a business relationship with a third party, our first step is to conduct an initial assessment. This involves gathering relevant information about the potential partner, such as their business activities, ownership structure, and reputation.

### **9.2. RISK IDENTIFICATION**

During the initial assessment, we identify any potential risks associated with the third party. This includes assessing their geographical location, industry, business practices, and any prior history of legal or ethical violations.

### **9.3. DOCUMENTATION REVIEW**

We request the necessary documentation from the third party, including their company profile, financial statements, and legal documentation. This helps us gain insight into their operations and legal standing.

### **9.4. COMPLIANCE CHECK**

Our compliance team performs a comprehensive check to ensure that the potential partner aligns with anti-bribery laws and regulations. This involves verifying their compliance history and any involvement in unethical or illegal activities.

### **9.5. REPUTATION ASSESSMENT**

We conduct a reputation assessment by researching publicly available information, media coverage, and any past dealings of the third party. This helps us gauge their reputation and potential red flags.

### **9.6. REFERENCE CHECKS**

We contact references provided by the third party to validate their claims, reputation, and performance history. This step provides additional insights into their reliability and credibility.

### **9.7. RISK MITIGATION**

Based on the gathered information and assessments, we determine the level of risk associated with the potential partnership. If risks are identified, we work with the third party to develop a plan for mitigating these risks.

### **9.8. DECISION MAKING**

Our due diligence process concludes with a thorough review of all collected information. A decision is then made regarding whether to proceed with the business relationship, reject it, or request further information.

### **9.9. ONGOING MONITORING**

Once a business relationship is established, we continue to monitor our partners periodically. This ensures that their actions remain in line with our ethical standards and compliance requirements.

By diligently conducting this due diligence process, we aim to minimize potential risks and maintain the integrity of our business relationships.

### **10. REPORTING AND WHISTLEBLOWING**

Any employee or individual associated with our company who suspects or witnesses any form of bribery or corruption is encouraged to report it immediately to their supervisor, manager, or the designated compliance officer. Reports can also be made anonymously through our whistleblowing mechanism. We take a proactive approach to uncovering and addressing any suspicions or instances of bribery or corruption within our company. We have established a robust reporting and whistleblowing mechanism to ensure that any employee or individual associated with our organization can come forward with their concerns without fear of reprisal.

#### **10.1. ENCOURAGING TRANSPARENCY**

We emphasize a culture of transparency and accountability. Any individual who suspects or witnesses any form of bribery or corruption is strongly encouraged to report their concerns promptly. Our commitment extends to investigating all reports with diligence and impartiality.

#### **10.2. REPORTING CHANNELS**

Reports can be made through the following channels:

- a) Directly to the individual's immediate supervisor or manager.
- b) To the designated compliance officer responsible for handling such matters.

#### **10.3. WHISTLEBLOWING OPTION**

Recognizing the importance of anonymity in certain situations, we provide the option of making reports anonymously. The anonymity of the reporting individual will be rigorously maintained throughout the process.



#### **10.4. CONFIDENTIALITY**

We understand the sensitivity of such matters. Reports will be handled with the utmost confidentiality to safeguard the interests of all parties involved.

#### **10.5. NO RETALIATION POLICY**

Our company has a strict non-retaliation policy in place. Any individual who reports in good faith will be protected against any form of retaliation or adverse action for raising concerns.

#### **10.6. INVESTIGATION AND ACTION**

Upon receiving a report, our compliance team will conduct a thorough investigation. If wrongdoing is substantiated, appropriate action will be taken to rectify the situation and prevent future occurrences.

#### **10.7. REPORTING MISUSE**

Our reporting and whistleblowing mechanism is intended for the genuine reporting of concerns related to bribery and corruption. Misuse of this mechanism for false accusations or malicious intent will not be tolerated and may result in disciplinary action.

#### **10.8. COMPANY COMMUNICATION**

We will provide periodic updates to all employees and relevant stakeholders about the reporting and whistleblowing mechanism, reaffirming our commitment to addressing such matters.

### **11. CONSEQUENCES OF VIOLATIONS**

Violations of this policy will result in disciplinary action, up to and including termination of employment or contract. Maintaining the highest standards of integrity and ethical conduct is a cornerstone of our organization. We are committed to taking firm and decisive action in response to any violations of our Anti-Bribery & Anti-Corruption Policy. The consequences of breaching this policy are as follows:

**11.1. DISCIPLINARY ACTION**

Violations of this policy will result in appropriate disciplinary measures being taken against the individuals involved. The nature and severity of the violation will determine the level of disciplinary action. This may include verbal or written warnings, suspension, demotion, or other suitable actions in line with our internal policies.

**11.2. TERMINATION OF EMPLOYMENT OR CONTRACT**

For serious breaches of this policy, we reserve the right to terminate the employment of any employee found guilty of engaging in bribery or corruption. Similarly, contractual relationships with external parties, such as contractors, vendors, or partners, may be terminated if they are found to be in violation of this policy.

**11.3. LEGAL ACTION**

In cases where the breach of this policy involves illegal activities or causes significant harm to our company, our stakeholders, or external parties, we may choose to pursue legal action. Legal measures will be considered when deemed necessary to address the violation and protect our interests.

**11.4. REPORTING TO AUTHORITIES**

We may report violations of this policy to relevant authorities if required by law or if the violation has significant legal implications. Reporting to authorities will be done in accordance with applicable laws and regulations.

**11.5. REPUTATIONAL CONSEQUENCES**

Breach of this policy can have serious reputational consequences for both individuals and the organization as a whole. Our commitment to ethical conduct and compliance is integral to our reputation, and violations can tarnish our standing in the industry and among stakeholders.

## **12. TRAINING AND COMMUNICATION**

Recognizing the paramount importance of fostering a culture of compliance and ethical conduct, we are fully committed to implementing a comprehensive training and communication strategy in conjunction with our Anti-Bribery & Anti-Corruption Policy. This strategy is designed to ensure that all employees and relevant stakeholders are well-informed about the policy's principles and their responsibilities within its framework.

## **13. ONGOING TRAINING PROGRAMS**

We have designed a series of targeted training programs aimed at equipping our employees with a clear understanding of the Anti-Bribery & Anti-Corruption Policy. These programs will provide insights into recognizing potential risks, understanding the consequences of violations, and reporting concerns appropriately. Training will be conducted periodically to ensure that the information remains current and relevant.

## **14. INTEGRATION WITH ONBOARDING**

New employees will undergo a comprehensive orientation process that includes an introduction to the Anti-Bribery & Anti-Corruption Policy. This ensures that ethical considerations and compliance expectations are ingrained from the outset of their tenure.

## **15. CONCLUSION: UPHOLDING ETHICAL EXCELLENCE**

In concluding the AL RAWAIS GOLD FZC Anti-Bribery & Anti-Corruption Policy, we emphasize our unwavering commitment to maintaining the highest standards of integrity, transparency, and ethical conduct in all our endeavors. Our steadfast dedication to preventing bribery and corruption is an integral aspect of our identity as responsible corporate citizens.

By implementing this policy, we seek to foster a culture where every employee, partner, and stakeholder understands their role in upholding ethical values. We firmly believe that through collective efforts, we can create a business environment that is resilient to unethical practices and aligned with regulatory expectations.

Our commitment extends beyond mere policy documentation; it reflects our pledge to actively practice and promote these principles. We encourage open dialogue, adherence to our reporting mechanisms, and active participation in our training and communication initiatives. Together, we can ensure that AL RAWAIS GOLD FZC stands as a beacon of integrity within the precious metal stones industry.