

Greenlight Business Ventures Ltd. (GBV)

Anti-Corruption Code of Conduct and Ethical Policy

1. Introduction

1.1. Purpose

The Anti-Corruption Code of Conduct and Ethical Policy (the "Code") of GBV sets forth the principles and standards that govern our business activities globally. This Code aims to ensure that all employees, contractors, and partners adhere to the highest standards of integrity and ethics, preventing and combating corruption and bribery in all its forms.

1.2. Scope

This Code applies to all employees, directors, officers, agents, contractors, and any third parties acting on behalf of GBV across all jurisdictions where we operate. It is mandatory and must be followed in all business dealings and operations.

2. Ethical Principles

2.1. Integrity and Honesty

All business activities must be conducted with integrity and honesty. We expect our employees and partners to act ethically and uphold our values in every aspect of their work.

2.2. Fairness and Respect

We are committed to treating everyone fairly and with respect. Discrimination, harassment, or any form of unfair treatment is not tolerated.

2.3. Transparency and Accountability

We strive for transparency in our operations and hold ourselves accountable for our actions. Accurate and timely disclosure of information is essential.

2.4. Compliance with Laws

All employees and representatives must comply with applicable local and international laws, regulations, and standards, including anti-corruption laws.



3. Anti-Corruption Guidelines

3.1. Bribery and Corruption

Offering, giving, receiving, or soliciting bribes is strictly prohibited. This includes any form of payment or benefit that could influence a business decision or gain an improper advantage.

3.2. Facilitation Payments

Facilitation payments, even if considered a local custom, are not permitted under any circumstances.

3.3. Gifts, Entertainment, and Hospitality

Any gifts, entertainment, or hospitality must be modest, infrequent, and transparent. They should never be intended or perceived as an attempt to influence a business decision improperly.

3.4. Political Contributions

GBV does not make contributions to political parties, candidates, or political campaigns. Employees may engage in political activities in their personal capacity but must not use company resources for such activities.

3.5. Charitable Donations and Sponsorships

All charitable donations and sponsorships must be made transparently and for legitimate purposes. They must not be used to gain undue influence or as a conduit for bribery.

4. Responsibilities

4.1. Employee Responsibilities

Employees are expected to understand and comply with this Code. They must report any suspected or actual violations promptly through the established reporting channels.

4.2. Management Responsibilities

Managers are responsible for promoting a culture of integrity and ensuring their teams understand and adhere to this Code. They must provide guidance and support to employees in ethical decision-making.

4.3. Third-Party Responsibilities

Third parties, including agents, contractors, and suppliers, must comply with this Code when acting on behalf of [Company Name]. Due diligence will be conducted to ensure compliance, and anti-corruption clauses will be included in contracts.



5. Compliance and Reporting

5.1. Training and Communication

GBV will provide regular training on anti-corruption and ethical practices to all employees. The Code will be communicated clearly and made accessible to all relevant parties.

5.2. Monitoring and Auditing

The company will conduct regular audits and assessments to monitor compliance with this Code. Any deficiencies identified will be addressed promptly.

5.3. Reporting Violations

Employees and third parties are encouraged to report any suspected or actual violations of this Code through confidential reporting channels, including a whistleblower hotline. Reports can be made anonymously.

5.4. Investigation and Discipline

All reports of violations will be investigated thoroughly and promptly. Disciplinary action, up to and including termination, will be taken against any employee found to have violated this Code.

5.5. Non-Retaliation Policy

GBV strictly prohibits retaliation against anyone who reports a violation or cooperates in an investigation. Retaliation will result in disciplinary action.

6. Review and Amendments

6.1. Regular Review

This Code will be reviewed regularly to ensure it remains relevant and effective. Updates will be made as necessary to reflect changes in laws, regulations, or company practices.

6.2. Amendments

Any amendments to this Code will be communicated to all employees and relevant parties promptly. Employees are expected to familiarize themselves with any changes.

7. Conclusion

Adherence to this Anti-Corruption Code of Conduct and Ethical Policy is essential for maintaining the trust and confidence of our stakeholders. By committing to these principles, GBV ensures the integrity, transparency, and ethical conduct of our business operations worldwide.