

# ANTI – BRIBERY POLICY

## 1. INTRODUCTION

Unfortunately, bribery and corruption are common features of corporate and public life in many countries around the world. Governments, businesses, and non-governmental organisations are collaborating to address the issue. As part of the UK Government's commitment to eradicating bribery, the Bribery Act 2010 was passed in 2010 and went into effect in 2011. Emerj.io has a clear anti-bribery and corruption policy, and we encourage our employees to make decisions that are consistent with our stated position. Bribery and corruption are not tolerated at Emerj.io.

## 2. OBJECTIVE

The objective of this Policy is to outline Emerj.io employees' responsibilities for adhering to and upholding our stance on bribery and corruption. It also includes our partners', suppliers', and other third-party obligations to ensure compliance with our Policy and there are no exceptions to this Policy. Emerj.io does not tolerate any form of bribery and corruption. Violations of this Policy may result in dismissal for gross misconduct, immediate contract termination, prosecution, or additional sanctions. Please note that if local laws, codes of conduct, or other regulations in a particular country or region are more restrictive on this subject, or require government approval of the transaction, then any Emerj.io colleague or representative, including any partners, supplier, intermediaries, or consultants, operating in that country or region must fully comply with the more restrictive requirements.

## 3. SCOPE

This Policy applies to all Emerj.io colleagues and extends to all our business dealings and transactions in all countries in which we operate. This Policy also applies to our business partners including suppliers, intermediaries, joint venture partners and other third parties.

## 4. OUR POLICY

We want to ensure that when we deliver our world-class standards, we always act with integrity. This means that Emerj.io will not engage in bribery or any other unethical inducement or payment, such as facilitation payments or "kickbacks.". All colleagues, as well as any party working on Emerj.io's behalf, must not make, offer to make, promise, or make payments, or give anything of value to any third party including any partner, supplier, or government official to assist Emerj.io in obtaining or retaining an improper business advantage, whether or not any benefit is actually received.

## 5. HOSPITALITY AND GIFTS

All colleagues, partners, suppliers, and other third parties are required to refrain from engaging in any activities that could lead to or imply a conflict of interest with Emerj.io's business. Our guiding principle regarding corporate hospitality is that rather than an individual benefiting from corporate hospitality from a client, supplier, or partner, we would prefer that the business benefit from a reduced cost of goods or services.

## **6. RED FLAGS**

All colleagues and representatives (including partners and suppliers) are responsible for reporting potential issues and should be aware of the following non-exhaustive list of red flags:

- Allegations of unethical business activities by any Emerj.io employee or third party;
- Any family or other relationships between any Emerj.io colleague or third party that could influence the decision of a Emerj.io colleague;
- An Emerj.io colleague's reluctance to enable another colleague to deal with a certain supplier;
- Demands by a partner or supplier for extraordinarily high commissions or fees for services;
- Requests for payments to be made in a third country or to another name or company different from the one earning the commission;
- A third party insisting that its identity remain confidential or refuses to divulge the identity of its owners.

## **7. RECORD-KEEPING PROVISIONS**

Colleagues are accountable for producing correct and comprehensive entries in the company's official records. Colleagues should never:

- Pay exorbitant costs that lack clear description or accompanying documentation, or appear to be improper;
- Use personal funds to accomplish what is otherwise prohibited by this Policy.

## **8. COMMUNICATIONS AND TRAINING**

We will communicate this policy and relevant guidance to colleagues across Emerj.io through our established internal communication channels. Managers, colleagues, and agents will receive relevant training on how to implement this policy in the scope of their employment. Each departmental head will be responsible for ensuring that its department complies with the policy and will be required to report compliance on an annual basis. New colleagues in key departments will be required to undertake training on the Policy

## **9. RESPONSIBILITIES**

Emerj.io's board of directors has specifically directed issuance and implementation of Emerj.io's Anti Bribery Policy and retains ultimate responsibility for ensuring that it meets its obligations under the Bribery Act 2010.

## **10. RAISING CONCERNS AND SEEKING GUIDANCE**

Colleagues, suppliers, partners or other third parties are encouraged to raise concerns about any instance of non-compliance at the earliest possible stage. Colleagues can speak directly to their line manager or talk to an independent and trusted senior manager. Colleagues, suppliers, partners or other third parties can also make contact confidentially with Emerj.io by writing to: Director at [info@emerj.io](mailto:info@emerj.io).

Anyone raising a concern in good faith will not be criticised or penalised in any way even if it is shown, after investigation, that they were mistaken. Any form of reprisal or victimisation against anyone who has raised a genuinely held concern is forbidden and will not be tolerated and itself will be treated as a disciplinary matter.

## **11. PENALTIES**

Violations of the Bribery Act 2010 and other anti-corruption legislation are a serious matter and could result in significant penalties for Emerj.io and for those individuals responsible for an offence. Penalties include imprisonment for individuals committing the offence for up to 10 years together with unlimited fines for individuals and the business. Senior Officers who were aware of the bribes may also face penalties. Fines imposed on individuals will not be paid by Emerj.io.