

## ANTI-CORRUPTION AND BRIBERY POLICY

### The E-Jerrys Approach to Bribery and corruption

In accordance with our Statement of Ethic, it is E-Jerry's policy to conduct our business in an honest and ethical manner.

We operate a zero-tolerance approach towards Bribery and Corruption.

This policy applies to our employees and all persons working for us in any capacity, including; all agency workers, contract workers, external consultants, third-party representatives and interns.

### What is Bribery and Corruption?

Bribery is offering, promising, giving or accepting any financial or other advantage to induce the recipient or any other person to act improperly in the performance of their functions, or reward them for acting improperly, or when the recipient would act improperly by accepting an advantage. An advantage includes money, gift, loans, fees, hospitality, services, and discounts, the awards of a contract or anything else of value.

A person acts improperly where they act illegally, unethically or contrary to an expectation of good faith or impartiality or where they abuse a position of trust.

**Corruption** is the abuse of entrusted power or position for private gain.

### What is Fraud?

Fraud can be committed in three principal ways:

- **Fraud by false representation** i.e. making a false representation acting dishonestly, knowing that the representation might be untrue or misleading, intending to make a gain for one self or another, to cause loss to another or expose another to risk of loss
- **Fraud by failing to disclose information** such as to another person, when you have a legal duty to disclose information, intending to make a gain for oneself, to cause loss to another or expose another to risk of loss
- **Fraud by abuse of position** i.e. occupying and abusing a position in which the individual was expected to safeguard, or to act against the financial interests of another person, intending by that abuse, to make-a gain or cause a loss and acting dishonestly.

### Gifts, Hospitality and Expenses:

The giving or receiving of gifts and hospitality maybe used or perceived as an opportunity to facilitate corruption.

We are committed to ensuring that giving and receiving of gifts and hospitality is managed and controlled effectively.

### Disciplinary Consequences:

All principles described in this policy must be strictly followed. A breach of this policy will invoke disciplinary and possibly legal action.

