

Ample Pro

Anti – Bribery and Corruption Policy

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1. Introduction

Ample Pro Inc. (“the Company”) is committed to conducting business ethically and in compliance with all applicable laws, including those relating to anti-bribery and corruption. This Anti-Bribery and Corruption Policy outlines the Company’s commitment to preventing bribery and corruption in all forms and ensuring transparency and integrity in all business dealings. This policy applies to all employees, officers, directors, contractors, suppliers, and business partners, regardless of their location, including operations in the United States and Dubai.

2. Scope and Applicability

This policy applies to:

- **All employees, officers, and directors** of Ample Pro Inc.
- **Contractors, suppliers, and business partners** involved in the Company’s operations.
- **Third parties** acting on behalf of or in conjunction with the Company.

3. Definition of Bribery and Corruption

- **Bribery:** The offering, promising, giving, accepting, or soliciting of an advantage (financial or otherwise) as an inducement for action which is illegal, unethical, or a breach of trust.
- **Corruption:** The abuse of entrusted power for private gain, which can involve bribery, extortion, fraud, or other forms of unethical behavior.

4. Policy Statements

- **Prohibition of Bribery:** The Company strictly prohibits the offering, giving, receiving, or soliciting of bribes in any form. This applies to both direct and indirect activities, including through third parties.
- **Gifts and Hospitality:** Employees must not offer or accept gifts, hospitality, or other benefits that could be perceived as a bribe or influence business decisions. Modest gifts and hospitality may be accepted if they are in line with customary business practices, legal, and not intended to influence decision-making.

- **Facilitation Payments:** The Company prohibits the making of facilitation payments—small, unofficial payments made to expedite or secure routine governmental actions. Employees must not make or accept such payments under any circumstances.
- **Third-Party Relationships:** The Company requires all third parties, including agents, contractors, and suppliers, to comply with this Anti-Bribery and Corruption Policy. Due diligence must be conducted on all third parties before entering into business relationships.
- **Political Contributions:** The Company does not make donations, whether in cash or kind, to political parties, candidates, or organizations as a way of obtaining an advantage in business transactions.
- **Charitable Donations:** Any charitable donations made by the Company must be legal, ethical, and not used as a subterfuge for bribery. All charitable contributions must be transparent and accurately recorded.

5. Responsibilities

- **Employees:** All employees are responsible for understanding and complying with this policy. Employees must report any suspicion of bribery or corruption immediately.
- **Managers:** Managers are responsible for ensuring that their teams understand and adhere to this policy. Managers must also ensure that employees receive appropriate training on anti-bribery and corruption.
- **Compliance Officer:** The Compliance Officer is responsible for overseeing the implementation of this policy, conducting regular risk assessments, and ensuring that the Company complies with all relevant anti-bribery and corruption laws and regulations.

6. Reporting and Whistleblower Protection

- **Reporting Mechanism:** Employees and other stakeholders are encouraged to report any concerns or suspicions of bribery or corruption through the Company's confidential whistleblower hotline or other reporting channels.
- **No Retaliation:** The Company prohibits retaliation against anyone who reports concerns in good faith. Any form of retaliation will be subject to disciplinary action, up to and including termination of employment.

7. Training and Awareness

- **Mandatory Training:** All employees, particularly those in roles susceptible to bribery risks (e.g., sales, procurement, and international operations), must undergo regular training on anti-bribery and corruption.
- **Awareness Campaigns:** The Company will conduct regular awareness campaigns to reinforce the importance of adhering to anti-bribery and corruption practices.

8. Monitoring and Compliance

- **Internal Audits:** The Company will conduct regular internal audits to ensure compliance with this policy. Any non-compliance will be addressed promptly.
- **Disciplinary Action:** Violations of this policy will result in disciplinary action, which may include termination of employment and legal action.

9. Compliance with Laws

Ample Pro Inc. is committed to complying with all applicable anti-bribery and corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and relevant laws in Dubai. Where local laws are stricter than this policy, the stricter laws will take precedence.

10. Review and Updates

This Anti-Bribery and Corruption Policy will be reviewed annually by the Company's Compliance Officer and updated as necessary to reflect changes in the law, regulatory requirements, or the Company's operations.

By implementing this Anti-Bribery and Corruption Policy, Ample Pro Inc. demonstrates its commitment to ethical business practices and compliance with international anti-corruption standards, ensuring that all business dealings are conducted with integrity.