



POLICY MEMORANDUM NO: HOEC / ABAC / 2023

DATE OF ISSUE:

01 - 01 - 2023

VALID TILL:

30 - 12 - 2025

PROPOSED BY:

HR Manager

Managing Director, HOEC

APPROVED BY:

DISTRIBUTION

ALL EMPLOYEES

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

It is HOEC's policy to conduct all of its business in an honest and ethical manner. HOEC takes a zero-tolerance approach to bribery and corruption and is committed to act professionally, fairly and with integrity in all its business dealings and relationships.

It is the responsibility of all HOEC employees to conduct operations and activities in compliance with applicable Anti-bribery and Anti-Corruption Laws, which prohibits improper/ unethical payments to Government Officials (GO). Any payment or benefit conveyed to a GO must be fully transparent, properly documented, and accounted for.

HOEC expects everyone associated with it to conduct its business with integrity regardless of the existence of any local customs or traditions that may question integrity.

HOEC prohibits all forms of bribery and corruption whether involving any person or company and whether directly or indirectly.

Direct or indirect offer or pay, or authorize an offer or payment of money or anything of value to any person or entity which is:

- Intended to influence the judgment of the recipient in exercising his or her job responsibilities, or
- Intended to secure preferential treatment or an improper advantage for HOEC is strictly prohibited.

Direct or indirect request for or to accept any money or item of value, which is:

- Intended to influence the judgment or conduct of an HOEC Associate in his or her job responsibilities, or
- Intended as gratification for a decision or act in a way that benefits the person or entity giving the item of value is strictly prohibited and will result in termination of engagement.

This Policy extends across all of the Company's business units and locations in which the Company operates. All persons covered by this Policy, in discharging their duties on behalf of HOEC, are required to comply with the laws, rules and regulations applicable in the location in which HOEC is performing business activities.

Contact:

Please direct all questions regarding this policy to the HR Manager.