



**GILT TRADING L.L.C**

***GILT TRADING L.L.C***

***ANTI - BRIBERY &  
CORRUPTION POLICY***

# 1. PURPOSE

This Anti-Bribery and Corruption Policy sets out company's commitment to conducting its business ethically and in compliance with all applicable anti-bribery laws and regulations. This policy is designed to prevent bribery and corruption in all business dealings and relationships.

# 2. SCOPE

This policy applies to all employees, directors, officers, contractors, consultants, agents, intermediaries, and any other third parties representing or acting on behalf of the company in any capacity.

# 3. POLICY STATEMENT

[Your Company Name] has a zero-tolerance approach to bribery and corruption. It is strictly prohibited to offer, give, solicit, or receive any bribe, whether in cash or any other form, to gain an improper business advantage.

# 4. DEFINITIONS

- Bribery: Offering, giving, receiving, or soliciting something of value to influence a business decision or secure an unfair advantage.
- Facilitation Payments: Small unofficial payments made to expedite routine governmental actions.
- Kickbacks: Payments made in return for a business favor or advantage.

## 5. PROHIBITED CONDUCT

Employees and associated persons must not:

- Offer, promise, give, or authorize a bribe or improper payment.
- Request, agree to receive, or accept a bribe.
- Use intermediaries to facilitate bribery.
- Make facilitation payments, even where culturally expected.

## 6. GIFTS AND HOSPITALITY

Gifts and hospitality may only be accepted or offered if they are:

- Reasonable, proportionate, and infrequent.
- Not intended to influence a business decision or create an obligation.
- Fully disclosed and recorded in the company's gift register.

## 7. THIRD PARTIES AND DUE DILIGENCE

All third parties acting on behalf of the company must undergo appropriate due diligence. Contracts with third parties must include anti-bribery clauses, and their activities must be monitored regularly.

## 8. REPORTING AND WHISTLEBLOWING

Employees are encouraged to report any suspected bribery or corruption through the designated whistleblowing channels. Reports will be treated confidentially and investigated thoroughly. Retaliation against whistleblowers is strictly prohibited.

## 9. TRAINING AND COMMUNICATION

All employees must receive training on this policy and relevant anti-bribery laws. The policy will be communicated to all business partners and stakeholders.

## 10. MONITORING AND REVIEW

Compliance with this policy will be monitored through internal audits and reviews. The policy will be reviewed annually and updated as necessary to reflect changes in legal or regulatory requirements.

## 11. CONSEQUENCES OF BREACH

Any employee or associated person who breaches this policy will be subject to disciplinary action, up to and including termination of employment or contract. Breaches may also result in legal action or regulatory penalties.

