



## Anti-Corruption Policy

**Date:** 07.07.2023

### Introduction

Global Source Partners LLC ("the Company") is committed to conducting its business with integrity, transparency, and compliance with all applicable laws and regulations, including anti-corruption laws. The Company recognizes that corruption seriously threatens its reputation, financial stability, and legal standing. Therefore, this Anti-Corruption Policy aims to outline our commitment to preventing corruption in all aspects of our operations and to provide guidance to all employees, agents, contractors, and business partners on how to recognize and address corruption-related risks.

### Policy Statement

#### Zero-Tolerance Approach

The Company maintains a strict zero-tolerance approach towards corruption, bribery, and unethical business practices. We are committed to conducting our business with honesty, fairness, and compliance with all relevant anti-corruption laws and regulations, including the applicable laws of the countries in which we operate.

#### Applicability

This policy applies to all employees, Top management, agents, contractors, and business partners of the Company, regardless of their position or location.

### Prohibited Activities

#### Bribery and Corruption

Employees, agents, contractors, and business partners of the Company are strictly prohibited from offering, giving, receiving, or facilitating bribes, kickbacks, or any other corrupt payments to or from any individual, organization, or government official.

#### Facilitation Payments

Facilitation payments, often called "grease payments," are small, unofficial payments made to expedite routine government actions or services. The Company prohibits the use of facilitation payments in any circumstances.





### Gifts, Entertainment, and Hospitality

Gifts, entertainment, and hospitality provided to customers, clients, suppliers, or other business associates must be reasonable, transparent, and compliant with applicable laws. Gifts or hospitality that could be perceived as an attempt to gain improper influence are strictly prohibited.

### Political Contributions

The Company does not make political contributions or engage in political activities that may compromise its integrity or breach anti-corruption laws.

## **Reporting and Compliance**

### Reporting Suspected Violations

Employees, agents, contractors, and business partners must promptly report any suspected violations of this policy or any corrupt activities they become aware of. If preferred, reports can be made to the designated personnel/through an anonymous reporting mechanism.

### Non-Retaliation

The Company prohibits retaliation against individuals who make good-faith reports of suspected violations. Retaliation is a serious violation of our policy and will result in disciplinary action, including termination of employment or contract.

### Compliance Training

The Company is committed to providing regular anti-corruption training and awareness programs to its employees and relevant business partners to ensure a clear understanding of the policy and its implications.

## **Consequences of Non-Compliance**

Violations of this Anti-Corruption Policy may result in disciplinary action, including termination of employment or contract.



## **Conclusion**

Global Source Partners LLC is dedicated to conducting its business activities ethically, responsibly, and in compliance with all anti-corruption laws and regulations. We expect the full cooperation and commitment of all employees, agents, contractors, and business partners in upholding the principles of this Anti-Corruption Policy. Together, we can maintain a culture of integrity and transparency that reflects positively on our business and its reputation.





to seek guidance from the designated personnel if they have any questions or concerns related to this policy.

### **Conclusion**

Global Source Partners LLC is dedicated to conducting its business activities ethically, responsibly, and in compliance with all anti-corruption laws and regulations. We expect the full cooperation and commitment of all employees, agents, contractors, and business partners in upholding the principles of this Anti-Corruption Policy. Together, we can maintain a culture of integrity and transparency that reflects positively on our business and its reputation.

### **Approved by:**

Rzayev Tural  
Director

