

### 1. ABAC Policy

- ❖ This policy covers the principles and requirements on Anti-Bribery and Anti-Corruption (ABAC), and maintenance of business documentation and financial records.

### 2. ABAC Principles

- ❖ Bribery is a crime and is defined as the offering, giving, promising, receiving, or soliciting of anything of value.
- ❖ Holmed Group does not, directly or through a third party, promise, offer, make, authorize, solicit or accept any financial or other advantage, to or from anyone, to obtain or retain business or secure an improper advantage in the conduct of business.
- ❖ Holmed Group does not make, perform, engage, allow, authorise or allow Bribery to influence the actions or conduct of an official or any other person in his/her duties.
- ❖ Our ABAC principles follow mandatory requirements:
  - 1- Legitimacy of Intent: Holmed Group's activities, interactions and transactions have a valid purpose and are conducted in line with Holmed Group's values and expectations.
  - 2- Transparency: Everything that Holmed Group does is open, transparent and properly documented.
  - 3- Proportionality: Transfers of value made and resources invested meet but do not exceed the needs of the interaction or transaction.
  - 4- No conflicts of interest or undue influence: Holmed Group does not exercise under influence over those who interact with the Group. Holmed Group of Companies avoids situations that create or appear to create conflicts of interest.
- ❖ Holmed Group of Companies Strictly Prohibits Facilitation Payment.
  - 1- Facilitation payments are unofficial, improper, small transfers of value offered or made to secure or expedite a routine or necessary action to which Holmed Group employees are legally entitled.
  - 2- Holmed Group must make and keep books, records and accounts that accurately and fairly reflect Holmed Group's transactions and assets.
  - 3- We must maintain an adequate system of internal accounting controls. These must be sufficient to detect irregularities and prevent violations of this policy. Circumventing, evading or attempting to circumvent or evade Holmed Group's internal accounting controls is strictly prohibited.

### 3. Third Parties

- ❖ Holmed Group prohibits direct and indirect bribery.
- ❖ Third parties acting on behalf of Holmed Group should abide by strict requirements:
  1. Is fully qualified to perform the requested services and is not being retained for any improper purpose.
  2. Is subject to appropriate due diligence.
  3. Has its activities and reimbursable expenses monitored to ensure compliance with applicable anti-bribery laws.

4. Agrees to anti-bribery and business ethics language in the related service agreement or contract.
5. Agrees that the agreement with the third party may be terminated for non-compliance with Holmed Group's policies or applicable laws, rules or regulations.

**4. Reporting Violation**

- ❖ Reporting of actual or suspected violation to the applicable law or to this policy should be done immediately to the Compliance Department without any fear and in accordance with the company's code of conduct. Reporting can be done through Holmed Group Compliance Hotline (01-595123) and through Holmed Group email ([compliance@holmedgroup.com](mailto:compliance@holmedgroup.com)).