AUREUS Enterprises DMCC

Unit No: 32-H, Gold Tower (AU), Jumeirah Lakes Towers, Dubai, United Arab Emirates, P.O. Box-50605



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Bribery Policy

Version 4.3.2022

Compliance Desk

Aureus Enterprises DMCC 32 H, Gold Tower, Cluster I Dubai, UAE PO Box 50605

Contents

- 1. Purpose.
- 2. Scope
- 3. Definition
- 4. Duties & Responsibilities
- 5. Related Parties
- Training 6.
- Monitoring and notifying:

Purpose:

This Anti-Bribery Policy ("Policy") sets out the responsibilities of Aureus Enterprises DMCC and the responsibilities of those working for and with us, in observing and upholding our position on Bribery and Corruption and for the purpose of dealing with our global Third Parties, Aureus Enterprises DMCC shall comply with all applicable laws (UAE Penal Code) and regulations that aim to prevent Bribery and Corruption.

Scope:

Aureus Enterprises DMCC Anti-bribery policy include:

- All Aureus Enterprises DMCC employees and Board of directors.
- Companies from whom we purchase goods and services and their employees, People and agency who is working on behalf of Aureus enterprises DMCC. including Lawyers, consultants, and Auditors.



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Definition:

By implication of the bribery offenses, a bribe is a gift, financial or other advantage offered or received, directly or indirectly, to induce or reward the improper performance of a relevant function or activity.

The UAE by means of Federal Decree No. 8 of 2006, defines 'bribery' as a criminal offense where the following is committed intentionally:

- (a) The promise, offering, or giving, to a public official either directly or indirectly, of an undue advantage, for the official himself or another person or entity. In order that the official act or refrain from acting in the exercise of his or her official duties;
- (b) The solicitation or acceptance by a public official, directly or indirectly, of an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties.

Duties & Responsibilities:

The implementation of an anti-bribery policy is the responsibility and duty of the Board of Directors. All Aureus Enterprises DMCC employees are responsible for ensuring compliance with established policies of the Board of Directors, effectively managing the risk associated with their business operations, and informing the Board of Directors if they encounter conduct, activity, or application which are in breach of the policy.

Related Parties:

The related parties such as the supplier, the customer, and business partners, must comply with the policy principles and other relevant regulations.

Relations with the person and institutions failing to comply with these conditions shall be terminated.

During the selection of the companies from which the goods and services are bought and to whom goods and services are sold the senior management should take into account the morality and a positive background after all necessary research and evaluation within the scope of the company. The Business partners which have negative information in regards to bribery should not be collaborated with even if they meet all other requirements.



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Training:

Training on this Policy will form part of the induction process for all new directors, officers, employees, and related third parties. All existing directors, officers, employees, and related third parties will receive relevant training on how to implement and adhere to this Policy.

Monitoring and notifying:

The Compliance Officer will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.

Internal control systems and procedures will be subject to audits to provide assurance that they are effective in countering bribery and corruption.

If opinion or suspicion exist that an employee or a person acting on behalf of Aureus Enterprises DMCC is acting in breach of this policy, the issue must be submitted to the management board.

For Aureus Enterprises DMCC

