GLOBAL TRADE DISTRIBUTION FZE
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ANTI-BRIBERY POLICY

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Mandatory for implementation by:	All employees
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1. Introduction

Global Trade Distribution FZE Company`s core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

2. Purpose and scope of Policy

2.1. This Policy sets out the Company's position on any form of bribery and corruption and provides guidelines aimed at:

a) ensuring compliance with anti-bribery laws, rules and regulations in any country within which Global
Trade Distribution FZE may carry out its business or in relation to which its business may be connected;

b) enabling employees and persons associated with the Company to understand the risks associated
with bribery and to encourage them to be vigilant and effectively recognize, prevent and report any wrongdoing, whether by themselves or others;

c) providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;

d) creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

2.2. This Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons"). All employees and associated persons are expected to adhere to the principles set out in this Policy.

3. Legal obligations

It is Global Trade Distribution FZE continues to expand into developing international markets, is imperative that all employees understand the activities prohibited by, and ensure Global Trade Distribution FZE compliance with, anti-bribery and anti-corruption laws in the countries in which

the Company does business. Each employee, officer, director or agent has the responsibility for compliance with anti-corruption laws within their area of authority and to report any violations to their immediate supervisor.

4. Policy statement

4.1. All employees and associated persons of Global Trade Distribution FZE are required to:

a) comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business;

b) act honestly, responsibly and with integrity;

c) safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

4.2. Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

4.3. Global Trade Distribution FZE recognizes that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to your line manager.

4.4. The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

a) the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage b) it complies with local laws

b) it is given in the Company's name, not in the giver's personal name

c) it does not include cash or a cash equivalent (such as gift vouchers)

d) it is of an appropriate and reasonable type and value and given at an appropriate time

e) it is given openly, not secretly

f) it is approved in advance by a director of the Company.

4.5. In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

4.6. Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited.

5. Responsibilities and reporting procedure

5.1. It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption. You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Company but equally to all employees and associated persons.

5.2. The Company encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the

circumstances. The Company is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

5.3. The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

6. Record keeping

6.1. All accounts, receipts, invoices and other documents and records relating to dealings with associated persons and all other financial documents must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

7. Sanctions for breach

7.1. A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

7.2. As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

8. Monitoring compliance

8.1. The Company's Anti-Corruption Officer has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

9. Training

9.1. The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

Global Trade Distribution FZE
Managing Director
Boris Kim