



Neda General Trading Importer of  
Petroleum Products Ltd.

## **Anti-Bribery and Corruption Policy**



## 1. Policy Statement

1.1 At NGT, we conduct all of our business activities in an honest and ethical manner with a zero-tolerance approach to bribery and corruption. The core of our culture revolves around upholding the highest professional values, and we extend these practices to our staff, our consumers and our industry contemporaries.

1.2 NGT refuses to conduct business with any third parties that do not uphold the same ethical code of conduct of the highest integrity.

1.3 All employees and affiliates representing NGT are strictly prohibited from offering, soliciting or accepting a bribe or unauthorized payment. Employees in breach of this policy will be subject to disciplinary action that may result in a charge of gross misconduct and ultimately dismissal. Additionally, employees and affiliates must note that bribery is a criminal offence with extremely severe consequences.

### 1.4 The purpose of this policy is to:

- a) Set out NGT's responsibilities, and the responsibilities of those working for us or associated with us, in observing and upholding our zero tolerance position on bribery and corruption;
- b) Provide information and guidance to those working for us on how to recognize and deal with bribery and corruption issues.

### 1.5 Terms used in this policy:

- a) "we", "our" and "us" refer to NGT
- b) "third party" includes but is not limited to: any individual or organization we come into contact with during the course of our work; actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

1.6 **It is imperative that all our employees read, understand and act in accordance with this policy, in conjunction with the relevant Employee Handbook or local employee policies.**



## **2. To whom does this policy apply?**

2.1 This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, home workers, casual workers and agency staff, agents, channel partners or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "Workers" in this policy).

## **3. What is considered a breach of this policy?**

3.1 It is an offence:

- a) To bribe another person
- b) To be bribed
- c) To bribe a foreign public official
- d) For a company to fail to prevent bribery

3.2 You must never offer, promise or give a financial or other advantage to any person (including a foreign public official) with the intention of inducing or rewarding improper performance by them.

3.3 You must never directly or indirectly accept or agree to receive a financial or other advantage as a reward for the improper performance of your duties. It makes no difference whether the advantage is for you or a third party.

3.4 You must never threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy

3.5 With regards to gifts, hospitality and entertainment please refer to section 4 of this document.

3.6 Any confusion over an ambiguous situation should be referred to your line manager as soon as possible.

## **4. Gifts, Hospitality and Entertainment**

In addition to the aforementioned breaches cited in section 3 you must refrain from the following:

4.1 Give, promise to give, or offer, a payment, gift or hospitality with the intention of influencing, inducing or rewarding improper performance

4.2 Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure (where the payment is not a legitimate payment pursuant to local written law)



- 4.3 Accept a gift, hospitality from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them which will be obtained through improper performance by you or us
- 4.4 Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with the intention of influencing improper performance by us in return
- 4.5 Where your role requires this, you are permitted to give and receive hospitality (you should ask your line manager if you are unsure about this), but this should always be in a reasonable and proportionate manner.

## 5. What happens if you are in breach of this policy?

- 5.1 Employees in breach of this policy will be subject to disciplinary action that may result in a charge of gross misconduct and ultimately dismissal.
- 5.2 Be aware that bribery is a criminal offence, which can preclude one to fines and imprisonment.

## 6. Reporting an offence

- 6.1 At NGT we believe that we are all responsible and integral to the maintenance of our high ethical standards, as such we endeavour to create an environment that allows you to raise any concerns you have.
- 6.2 Should you be of the opinion that any individual affiliated with the NGT has failed to conduct themselves in line with this documented policy, we strongly encourage you to report the offence without fear of disciplinary action being taken against you.
- 6.3 All offences should be reported to your line manager or a senior manager who will document your findings and advise on the next best step to investigate the matter accordingly.

## 7. Policy Review

- 7.1 This policy will be reviewed on an annual basis, with the next review date in **January 2025**.



Neda General Trading Importer of  
Petroleum Products Ltd.

## **Anti-Money Laundering Policy**



## 1. Policy Statement

1.1 At NGT, we conduct all of our business activities in an honest and ethical manner with a zero-tolerance approach to money laundering offences. The core of our culture revolves around upholding the highest professional values, and we extend these practices to our staff, our consumers and our industry contemporaries.

1.2 NGT refuses to conduct business with any third parties that do not uphold the same ethical code of conduct of the highest integrity and have been found to commit a money laundering offence.

1.3 All employees and affiliates representing NGT are strictly prohibited from offering, soliciting or accepting a transaction that they suspect may be linked to money laundering. Employees in breach of this policy will be subject to disciplinary action that may result in a charge of gross misconduct and ultimately dismissal. Additionally, employees and affiliates must note that money laundering is a criminal offence with extremely severe consequences.

### 1.4 The purpose of this policy is to:

- a) Set out NGT's responsibilities, and the responsibilities of those working for us or associated with us, in observing and upholding our zero tolerance position on money laundering;
- b) Provide information and guidance to those working for us on how to report instances of money laundering.

### 1.5 Terms used in this policy:

- a) "we", "our" and "us" refer to NGT.
- b) "third party" includes but is not limited to: any individual or organization we come into contact with during the course of our work; actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

1.6 **It is imperative that all our employees read, understand and act in accordance with this policy, in conjunction with the relevant Employee Handbook or local employee policies.**



## **2. To whom does this policy apply?**

2.1 This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, home workers, casual workers and agency staff, agents, channel partners or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "Workers" in this policy).

## **3. What is Money Laundering?**

3.1 The UN Vienna 1988 Convention Article 3.1 has described Money Laundering as: “the conversion or transfer of property, knowing that such property is derived from any offense(s), for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in such offense(s) to evade the legal consequences of his actions”.

## **4. Money Laundering Reporting Officer**

4.1 The Money Laundering Reporting Officer (MLRO) is the individual responsible for overseeing NGT’s compliance with anti-money laundering regulations

4.3 All activity suspicious of money laundering must be reported to the MLRO, who has the ability to conduct further investigations and ultimately report to the police authorities as required.

## **5. What happens if you are in breach of this policy?**

5.1 Employees in breach of this policy will be subject to disciplinary action that may result in a charge of gross misconduct and ultimately dismissal.

5.2 Be aware that money laundering is a criminal offence, which can preclude one to fines and imprisonment.

## **6. Reporting Suspected Money Laundering Activity**

6.1 At NGT we believe that we are all responsible and integral to the maintenance of our high ethical standards, as such we endeavour to create an environment that allows all employees to raise any concerns in a safe manner.

6.2 Should any employee be of the opinion that any individual affiliated with the NGT has failed to conduct themselves in line with this documented policy, we strongly encourage you to report the offence without fear of disciplinary action being taken against you.



- 6.3 All instances where it is suspected that money laundering activity has occurred or is occurring, should be reported to the MLRO who will document your findings and investigate the matter accordingly.
- 6.4 The following information should be included in the report sent to the MLRO to investigate the activity:
  - a) Names of the people/entities involved
  - b) Details of their involvement
  - c) Details of the money laundering activity
  - d) Date of the occurrence of the activity
  - e) Location of activity
  - f) Any reasons for suspicions
  - g) Any other information you deem relevant
- 6.5 Once the report has been sent to the MLRO, they will respond to you confirming the receipt of your report and advise you on any further actions you are required to take.

## 7. Policy Review

- 7.1 This policy will be reviewed on an annual basis, with the next review date in **January 2025**