


ANTI-CORRUPTION POLICY		
	HR POLICY & PROCEDURE	Revision Date: June 30th, 2023
	Human Resources Department	Revision Number: 00
Purpose	To develop a disciplined ethically compliant workforce and ensure proper order at the workplace through corrective behavior	

Introduction:

Mahmood Group is committed to conducting its business with the highest standards of ethics, integrity, and transparency. Corruption poses a serious threat to our values, reputation, and the communities we serve. This Anti-Corruption Policy outlines our unwavering commitment to preventing, detecting, and addressing corruption within our organization.

Definitions:

Corruption: Any act or behavior, including but not limited to bribery, embezzlement, fraud, extortion, and nepotism that involves the misuse of authority or position for personal or organizational gain.

Bribery: The offering, giving, receiving, or soliciting of anything of value to influence or gain an improper advantage in any business, political, or governmental transaction.

Policy Statement:

Mahmood Group prohibits all forms of corruption, including bribery, in any of our operations, interactions, or relationships. We are committed to:

1. Promoting a culture of integrity and transparency throughout our organization.
2. Complying with all applicable anti-corruption laws and regulations in the jurisdictions in which we operate.
3. Proactively preventing and deterring corrupt practices within our organization.
4. Promptly investigating and addressing any reported incidents of corruption.
5. Holding all employees, contractors, and stakeholders accountable for adhering to this policy.

Leadership Commitment:

Our leadership, including directors, executives and managerial staff, will lead by example in upholding this policy and promoting ethical behavior. They are responsible for setting a tone of zero tolerance for corruption.

Code of Conduct:

All employees, contractors, and stakeholders are required to adhere to our Code of Conduct, which includes:

1. Avoiding conflicts of interest and promptly disclosing any potential conflicts.
2. Rejecting any form of bribery, extortion, or unethical influence.
3. Maintaining accurate and transparent financial records.
4. Reporting any concerns or suspicions of corruption through established reporting mechanisms.

Reporting Mechanisms:

Mahmood Group provides confidential and accessible channels for reporting suspected corruption, including a designated compliance officer. Whistleblowers will be protected from retaliation, and their confidentiality will be maintained.

Investigations and Enforcement:

All reports of suspected corruption will be promptly and impartially investigated. Violations of this policy will result in disciplinary actions, which may include termination, legal action, or fines, depending on the severity of the offense.

Training and Awareness:

Regular training and awareness programs will be conducted to educate employees, contractors, and stakeholders about this policy, relevant laws, and the consequences of corruption.

Compliance with Laws:

This policy complies with all applicable anti-corruption laws and regulations. Violating these laws may result in criminal or civil penalties.

Third-Party Relationships:

Mahmood Group expects all third parties, such as suppliers, partners, and consultants, to adhere to the same anti-corruption standards. Engaging in corrupt practices may lead to the termination of business relationships.

Continuous Improvement:

We are committed to the ongoing improvement of our anti-corruption policy and its implementation, taking into account emerging risks and changing circumstances.

Transparency:

Mahmood Group will maintain transparency by disclosing our anti-corruption efforts, successes, and challenges to relevant stakeholders as required by law or industry standards.

Communication:

This policy will be effectively communicated throughout the organization, and all stakeholders will be regularly reminded of their responsibilities.

By adhering to this Anti-Corruption Policy, we aim to maintain the integrity, reputation, and legal standing of Mahmood Group of Industries while contributing to a transparent and ethical business environment.